



TABLE TOP  
TELEPHONE COMPANY, INC.

July 1, 2014

Via ECFS:

Ms. Marlene H. Dortch  
Office of Secretary  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554

Re: WC Docket No. 10-90 & 11-42 Annual §54.313/54.422 Report of High-Cost and Low Income  
Recipient, Form 481

Dear Ms. Dortch:

Enclosed herein is the annual report for Table Top Telephone Company, Inc., Study Area Code 453334  
pursuant to §54.313/54.422 of the Commission's rules.

Please contact me with any questions at:

Phone: 559-868-6322  
Email: [mjboos@ponderosatel.com](mailto:mjboos@ponderosatel.com)

Sincerely,

Matthew J. Boos  
Secretary/Treasurer

Enclosures

Copies to:  
Universal Service Administrative Company  
Electronic Filing  
Washington, DC 20036

Arizona Corporation Commission  
Docket Control Center  
1200 West Washington Street  
Phoenix, Arizona 85007

Mr. Ben Shelly, President  
Navajo Nation  
P.O. Box 7440  
Window Rock, AZ 86515-7440

600 North Second Avenue  
Ajo, Arizona 85321  
(t) 520.387.5600  
(f) 520.387.5602  
[www.tabletoptelephone.com](http://www.tabletoptelephone.com)

**FCC Form 481 - Carrier Annual Reporting  
Data Collection Form**

FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

<010> Study Area Code	453334
<015> Study Area Name	TABLE TOP TEL CO
<020> Program Year	2015
<030> Contact Name: Person USAC should contact with questions about this data	Dan Douglas
<035> Contact Telephone Number: Number of the person identified in data line <030>	5598686395 ext.
<039> Contact Email Address: Email of the person identified in data line <030>	dand@ponderosatel.com

ANNUAL REPORTING FOR ALL CARRIERS		54.313 Completion Required	54.422 Completion Required
(check box when complete)			
<100> Service Quality Improvement Reporting	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<200> Outage Reporting (voice)	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<210> <input checked="" type="checkbox"/> <-- check box if no outages to report		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<300> Unfulfilled Service Requests (voice)	0	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<310> Detail on Attempts (voice)	<div style="border: 1px solid black; height: 40px; width: 100%;"></div> (attach descriptive document)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<320> Unfulfilled Service Requests (broadband)	0	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<330> Detail on Attempts (broadband)	<div style="border: 1px solid black; height: 40px; width: 100%;"></div> (attach descriptive document)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<400> Number of Complaints per 1,000 customers (voice)		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<410> Fixed	0.279	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<420> Mobile	0.0	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<430> Number of Complaints per 1,000 customers (broadband)		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<440> Fixed	0.0	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<450> Mobile	0.0	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<500> Service Quality Standards & Consumer Protection Rules Compliance	(check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<510> <div style="border: 1px solid black; height: 40px; width: 100%;"></div> 453334az510.pdf	(attached descriptive document)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<600> Functionality in Emergency Situations	(check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<610> <div style="border: 1px solid black; height: 40px; width: 100%;"></div> 453334az610.pdf	(attached descriptive document)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<700> Company Price Offerings (voice)	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<710> Company Price Offerings (broadband)	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<800> Operating Companies and Affiliates	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<900> Tribal Land Offerings (Y/N)? <input checked="" type="radio"/> <input type="radio"/>	(if yes, complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<1000> Voice Services Rate Comparability	(check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<1010> <div style="border: 1px solid black; height: 40px; width: 100%;"></div> 453334az1010.pdf	(attach descriptive document)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<1100> Terrestrial Backhaul (Y/N)? <input checked="" type="radio"/> <input type="radio"/>	(if not, check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<1110>	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<1200> Terms and Condition for Lifeline Customers	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

**Price Cap Carriers, Proceed to Price Cap Additional Documentation Worksheet**

<2000> Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers	(check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<2005>	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

**Rate of Return Carriers, Proceed to ROR Additional Documentation Worksheet**

<3000>	(check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<3005>	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

**(100) Service Quality Improvement Reporting  
Data Collection Form**

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

<010>	Study Area Code	453334
<015>	Study Area Name	TABLE TOP TEL CO
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Dan Douglas
<035>	Contact Telephone Number - Number of person identified in data line <030>	5598686395 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	dand@ponderosatel.com
<110>	Has your company received its ETC certification from the FCC?	(yes / no) <input type="radio"/> <input checked="" type="radio"/>
	If your answer to Line <110> is yes, do you have an existing §54.202(a) "5	
<111>	year plan" filed with the FCC?	(yes / no) <input type="radio"/> <input type="radio"/>

If your answer to Line <111> is yes, then you are required to file a progress report, on line <112> delineating the status of your company's existing § 54.202(a) "5 year plan" on file with the FCC, as it relates to your provision of voice telephony service.

<112> Attach Five-Year Service Quality Improvement Plan or, in subsequent years, your annual progress report filed pursuant to 47 C.F.R. § 54.313(a)(1). If your company is a CETC which only receives frozen support, your progress report is only required to address voice telephony service.

453334az112.pdf

Name of Attached Document

Please check these boxes below to confirm that the attached document(s), on line 112, contains a progress report on its five-year service quality improvement plan pursuant to § 54.202(a). The information shall be submitted at the wire center level or census block as appropriate.

<113> Maps detailing progress towards meeting plan targets  
 <114> Report how much universal service (USF) support was received  
 <115> How (USF) was used to improve service quality  
 <116> How (USF) was used to improve service coverage  
 <117> How (USF) was used to improve service capacity  
 <118> Provide an explanation of network improvement targets not met in the prior calendar year.




**(200) Service Outage Reporting (Voice)**

## Data Collection Form

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<039>	Contact Email Address - Email Address of person identified in data line <030>	dand@ponderosatel.com

[illegible]



<701>	Residential Local Service Charge Effective Date	1/1/2014
<702>	Single State-wide Residential Local Service Charge	

[illegible]

(710) Broadband Price Offerings  
Data Collection Form

FCC Form 481

OMB Control No. 3060-0986 / OMB Control No. 3060-0819

July 2013

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<020>	Program Year	2015
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<035>	Contact Telephone Number - Number of person identified in data line <030>	5598686395 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	dand@ponderosatel.com

[illegible]

(800) Operating Companies  
Data Collection Form

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

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<039>	Contact Email Address - Email Address of person identified in data line <030>	dand@ponderosatel.com

<810>	Reporting Carrier	Table Top Telephone Company, Inc.
<811>	Holding Company	Ponderosa Communications, Inc.
<812>	Operating Company	Table Top Telephone Company, Inc.

[illegible]



**(900) Tribal Lands Reporting  
Data Collection Form**

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010> Study Area Code 453334

<015> Study Area Name TABLE TOP TEL CO

<020> Program Year 2015

<030> Contact Name - Person USAC should contact regarding this data Dan Douglas

<035> Contact Telephone Number - Number of person identified in data line <030> 5598686395 ext.

<039> Contact Email Address - Email Address of person identified in data line <030> dand@ponderosatel.com

<910> Tribal Land(s) on which ETC Serves

Navajo Nation  
Navajo and Hopi Indian Relocation New Lands

<920> Tribal Government Engagement Obligation

453334az920.pdf

Name of Attached Document

If your company serves Tribal lands, please select (Yes,No, NA) for each these boxes to confirm the status described on the attached document(s), on line 920, demonstrates coordination with the Tribal government pursuant to § 54.313(a)(9) includes:

<921> Needs assessment and deployment planning with a focus on Tribal community anchor institutions.

<922> Feasibility and sustainability planning;

<923> Marketing services in a culturally sensitive manner;

<924> Compliance with Rights of way processes


<925> Compliance with Land Use permitting requirements

<926> Compliance with Facilities Siting rules

<927> Compliance with Environmental Review processes

<928> Compliance with Cultural Preservation review processes

<929> Compliance with Tribal Business and Licensing requirements.

Select (Yes,No, NA)
Yes

Yes
Yes
Yes
Yes
Yes
Yes
Yes
Yes

**(1100) No Terrestrial Backhaul Reporting  
Data Collection Form**

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

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<039>	Contact Email Address - Email Address of person identified in data line <030>	dand@ponderosatel.com

<1120> Please check this box to confirm no terrestrial backhaul options exist within the supported area pursuant to § 54.313(G) ☐

<1130> Please check this box to confirm the reporting carrier offers broadband service of at least 1 Mbps downstream and 256 kbps upstream within the supported area pursuant to § 54.313(G) ☐

**(1200) Terms and Condition for Lifeline Customers****Lifeline****Data Collection Form**

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

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<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Dan Douglas
<035>	Contact Telephone Number - Number of person identified in data line <030>	5598686395 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	dand@ponderosatel.com

453334az1210.pdf

&lt;1210&gt; Terms &amp; Conditions of Voice Telephony Lifeline Plans

Name of Attached Document

&lt;1220&gt; Link to Public Website

HTTP <http://tabletoptelephone.com>

"Please check these boxes below to confirm that the attached document(s), on line 1210, or the website listed, on line 1220, contains the required information pursuant to § 54.422(a)(2) annual reporting for ETCs receiving low-income support, carriers must annually report:

- <1221> Information describing the terms and conditions of any voice telephony service plans offered to Lifeline subscribers, ☒
- <1222> Details on the number of minutes provided as part of the plan, ☒
- <1223> Additional charges for toll calls, and rates for each such plan. ☒



**(2000) Price Cap Carrier Additional Documentation**

FCC Form 481

**Data Collection Form**

OMB Control No. 3060-0986/OMB Control No. 3060-0819

*Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers*

July 2013

<010>	Study Area Code	453334
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<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Dan Douglas
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<039>	Contact Email Address - Email Address of person identified in data line <030>	dand@ponderosatel.com

CHECK the boxes below to note compliance as a recipient of Incremental Connect America Phase I support, frozen High Cost support, High Cost support to offset access charge reductions, and Connect America Phase II support as set forth in 47 CFR § 54.313(b),(c),(d),(e) the information reported on this form and in the documents attached below is accurate.

**Incremental Connect America Phase I reporting**

- <2010> 2nd Year Certification {47 CFR § 54.313(b)(1)} ☐
- <2011> 3rd Year Certification {47 CFR § 54.313(b)(2)} ☐

**Price Cap Carrier Receiving Frozen Support Certification {47 CFR § 54.312(a)}**

- <2012> 2013 Frozen Support Certification ☐
- <2013> 2014 Frozen Support Certification ☐
- <2014> 2015 Frozen Support Certification ☐
- <2015> 2016 and future Frozen Support Certification ☐

**Price Cap Carrier Connect America ICC Support {47 CFR § 54.313(d)}**

- <2016> Certification Support Used to Build Broadband ☐

**Connect America Phase II Reporting {47 CFR § 54.313(e)}**

- <2017> 3rd year Broadband Service Certification ☐
- <2018> 5th year Broadband Service Certification ☐
- <2019> Interim Progress Certification ☐
- <2020> Please check the box to confirm that the attached document(s), on line 2021, contains the required information pursuant to § 54.313 (e)(3)(ii), as a recipient of CAF Phase II support shall provide the number, names, and addresses of community anchor institutions to which began providing access to broadband service in the preceding calendar year. ☐

- <2021> Interim Progress Community Anchor Institutions

Name of Attached Document Listing Required Information

## (3000) Rate Of Return Carrier Additional Documentation

FCC Form 481

## Data Collection Form

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	453334
<015>	Study Area Name	TABLE TOP TEL CO
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<030>	Contact Name - Person USAC should contact regarding this data	Dan Douglas
<035>	Contact Telephone Number - Number of person identified in data line <030>	5598686395 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	dand@ponderosatel.com

CHECK the boxes below to note compliance on its five year service quality plan (pursuant to 47 CFR § 54.202(a)) and, for privately held carriers, ensuring compliance with the financial reporting requirements set forth in 47 CFR § 54.313(f)(2). I further certify that the information reported on this form and in the documents attached below is accurate.

- (3010) Progress Report on 5 Year Plan  
Milestone Certification {47 CFR § 54.313(f)(1)(i)}

Name of Attached Document Listing Required Information

- (3011) Please check this box to confirm that the attached document(s), on line 3012 contains the required information pursuant to § 54.313 (f)(1)(ii), the carrier shall provide the number, names, and addresses of community anchor institutions to which began providing access to broadband service in the preceding calendar year.

- (3012) Community Anchor Institutions {47 CFR § 54.313(f)(1)(ii)}

Name of Attached Document Listing Required Information

- (3013) Is your company a Privately Held ROR Carrier {47 CFR § 54.313(f)(2)}  
(3014) If yes, does your company file the RUS annual report

(Yes/No) ☒ ☒  
(Yes/No) ☒ ☒

Please check these boxes to confirm that the attached document(s), on line 3017, contains the required information pursuant to § 54.313(f)(2) compliance requires:

- (3015) Electronic copy of their annual RUS reports (Operating Report for Telecommunications Borrowers)  
(3016) Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows

☒  
☒

- (3017) If the response is yes on line 3014, attach your company's RUS annual report and all required documentation

453334az3017.pdf

Name of Attached Document Listing Required Information

- (3018) If the response is no on line 3014, Is your company audited?

(Yes/No) ☒ ☒

If the response is yes on line 3018, please check the boxes below to confirm your submission, on line 3026 pursuant to § 54.313(f)(2), contains

- (3019) Either a copy of their audited financial statement; or (2) a financial report in a format comparable to RUS Operating Report for Telecommunications

☐

- (3020) Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows

☐

- (3021) Management letter issued by the independent certified public accountant that performed the company's financial audit.

☐

If the response is no on line 3018, please check the boxes below to confirm your submission, on line 3026 pursuant to § 54.313(f)(2), contains:

- (3022) Copy of their financial statement which has been subject to review by an independent certified public accountant; or (2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers,

☐

- (3023) Underlying information subjected to a review by an independent certified public accountant

☐

- (3024) Underlying information subjected to an officer certification.

☐

- (3025) Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows

☐

- (3026) Attach the worksheet listing required information

Name of Attached Document Listing Required Information

**Certification - Reporting Carrier  
Data Collection Form**

 FCC Form 481  
 OMB Control No. 3060-0986/OMB Control No. 3060-0819  
 July 2013

<010> Study Area Code	453334
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<020> Program Year	2015
<030> Contact Name - Person USAC should contact regarding this data	Dan Douglas
<035> Contact Telephone Number - Number of person identified in data line <030>	5598686395 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	dand@ponderosatel.com

**TO BE COMPLETED BY THE REPORTING CARRIER, IF THE REPORTING CARRIER IS FILING ANNUAL REPORTING ON ITS OWN BEHALF:**

Certification of Officer as to the Accuracy of the Data Reported for the Annual Reporting for CAF or LI Recipients	
I certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual reporting requirements for universal service support recipients; and, to the best of my knowledge, the information reported on this form and in any attachments is accurate.	
Name of Reporting Carrier:	TABLE TOP TEL CO
Signature of Authorized Officer:	CERTIFIED ONLINE <span style="float: right;">Date</span>
Printed name of Authorized Officer:	Matthew Boos
Title or position of Authorized Officer:	Secretary
Telephone number of Authorized Officer:	5598686322 ext.
Study Area Code of Reporting Carrier:	453334 <span style="float: right;">Filing Due Date for this form: 07/01/2014</span>
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	



**Certification - Agent / Carrier  
Data Collection Form**

 FCC Form 481  
 OMB Control No. 3060-0986/OMB Control No. 3060-0819  
 July 2013

<010> Study Area Code	453334
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<039> Contact Email Address - Email Address of person identified in data line <030>	dandeponderosatel.com

**TO BE COMPLETED BY THE REPORTING CARRIER, IF AN AGENT IS FILING ANNUAL REPORTS ON THE CARRIER'S BEHALF:**

Certification of Officer to Authorize an Agent to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I certify that (Name of Agent) _____ is authorized to submit the information reported on behalf of the reporting carrier. I also certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual data reporting requirements provided to the authorized agent; and, to the best of my knowledge, the reports and data provided to the authorized agent is accurate.	
Name of Authorized Agent: _____	
Name of Reporting Carrier: _____	
Signature of Authorized Officer: _____	Date: _____
Printed name of Authorized Officer: _____	
Title or position of Authorized Officer: _____	
Telephone number of Authorized Officer: _____	
Study Area Code of Reporting Carrier: _____	Filing Due Date for this form: _____
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

**TO BE COMPLETED BY THE AUTHORIZED AGENT:**

Certification of Agent Authorized to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I, as agent for the reporting carrier, certify that I am authorized to submit the annual reports for universal service support recipients on behalf of the reporting carrier; I have provided the data reported herein based on data provided by the reporting carrier; and, to the best of my knowledge, the information reported herein is accurate.	
Name of Reporting Carrier: _____	
Name of Authorized Agent or Employee of Agent: _____	
Signature of Authorized Agent or Employee of Agent: _____	Date: _____
Printed name of Authorized Agent or Employee of Agent: _____	
Title or position of Authorized Agent or Employee of Agent: _____	
Telephone number of Authorized Agent or Employee of Agent: _____	
Study Area Code of Reporting Carrier: _____	Filing Due Date for this form: _____
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

## Attachments

(700) Price Offerings including Voice Rate Data  
Data Collection Form

FCC Form 481

OMB Control No. 3050-0986/OMB Control No. 3060-0819  
July 2013

<010> Study Area Code 453334  
<015> Study Area Name TABLE TOP TEL CO  
<020> Program Year 2015  
<030> Contact Name - Person USAC should contact regarding this data Dan Douglas  
<035> Contact Telephone Number - Number of person identified in data line <030> 5598686395 ext.  
<039> Contact Email Address - Email Address of person identified in data line <030> dand@ponderosatel.com

<701> Residential Local Service Charge Effective Date  
<702> Single State-wide Residential Local Service Charge

1/1/2014

<703>

<a1>	<a2>	<a3>	<b1>	<b2>	<b3>	<b4>	<b5>	<c>
State	Exchange (ILEC)	SAC (CETC)	Rate Type	Residential Local Service Rate	State Subscriber Line Charge	State Universal Service Fee	Mandatory Extended Area Service Charge	Total per line Rates and Fees
AZ	Aguila		FR	14.0	0.0	0.0	0.0	14.0
AZ	Aguila/Vacation Service		FR	7.0	0.0	0.0	0.0	7.0
AZ	Aguila/Zone 1		FR	14.8	0.0	0.0	0.0	14.8
AZ	Aguila/Zone 2		FR	16.8	0.0	0.0	0.0	16.8
AZ	Bagdad		FR	14.0	0.0	0.0	0.0	14.0
AZ	Bagdad/Vacation Service		FR	7.0	0.0	0.0	0.0	7.0
AZ	Bagdad/Zone 1		FR	14.8	0.0	0.0	0.0	14.8
AZ	Bagdad/Zone 2		FR	16.8	0.0	0.0	0.0	16.8
AZ	Inscription Canyon		FR	14.0	0.0	0.0	0.0	14.0
AZ	Inscription Canyon/Vac		FR	7.0	0.0	0.0	0.0	7.0
AZ	Sanders		FR	14.0	0.0	0.0	0.0	14.0
AZ	Sanders/Vacation Service		FR	7.0	0.0	0.0	0.0	7.0
AZ	Sanders/Zone 1		FR	14.8	0.0	0.0	0.0	14.8
AZ	Sanders/Zone 2		FR	16.8	0.0	0.0	0.0	16.8
AZ	Seligman		FR	14.0	0.0	0.0	0.0	14.0
AZ	Seligman/Vacation Service		FR	7.0	0.0	0.0	0.0	7.0
AZ	Seligman/Zone 1		FR	14.8	0.0	0.0	0.0	14.8
AZ	Seligman/Zone 2		FR	16.8	0.0	0.0	0.0	16.8
AZ	Ajo		FR	14.0	0.0	0.0	0.0	14.0
AZ	Ajo/Vacation		FR	7.0	0.0	0.0	0.0	7.0
AZ	Ajo/Zone 1		FR	14.8	0.0	0.0	0.0	14.8



(700) Price Offerings including Voice Rate Data  
Data Collection Form

FCC Form 481

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<039>	Contact Email Address - Email Address of person identified in data line <030>	dand@ponderosatel.com

<701> Residential Local Service Charge Effective Date  
<702> Single State-wide Residential Local Service Charge

1/1/2014

<703>

[illegible]

<b>(710) Broadband Price Offerings</b> <b>Data Collection Form</b>	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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FCC Form 481  
OMB Control No. 3060-0986/OMB Control No. 3060-0819  
July 2013

<010>	Study Area Code	453334
<015>	Study Area Name	TABLE TOP TEL CO
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Dan Douglas
<035>	Contact Telephone Number - Number of person identified in data line <030>	5598686395 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	dand@ponderosatel.com

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# Form 481, Section 100 Service Quality Improvement Reporting

## Sub-Section 112 Narrative

FCC 5 Year Plan 2014-2019 Narrative

6-29-2014

### Company Overview

Table Top Telephone Company, Inc. (Table Top) serves 6 remote non-contiguous wire centers in the state of Arizona. The 6 wire centers are geographically dispersed in the northeast (Sanders), west (Seligman, Bagdad and Aguila), central (Inscription Canyon Ranch) and southern (Ajo) portions of the state. Currently, the company serves approximately 3647 voice lines, 272 circuits and 1,907 broadband customers across a diverse terrain of foothills, mountains and desert geography. Overall these areas are served via fiber routes, microwave radios and copper facilities. Table Top remains committed to the improvement of the network to carry more robust data services through efficient design, modern equipment upgrade and the maintenance and improvement of the voice system. Each wire center continues to be evaluated for network scalability, equipment modernization and the deployment of fiber to anchor institutions and beyond where applicable.

### Customer Demand and Network Evolution

While none of the Table Top exchanges are projected for significant line growth due to population expansion, demand for higher data rate broadband and data circuit services continue to put pressure on the network of each wire center. Schools, government institutions, medical clinics, wireless carriers, commercial business, non-profit organizations and residential broadband customers continue to request more robust data services. This drives our network design to ensure it is scalable and efficient to allow a diversity of access.

#### *Fiber Deployment*

Over the next 5 years Table Top will make a significant effort to maintain and improve our network infrastructure to maintain and improve the voice system while we build our capacity to deliver more robust access to broadband and data services to the customers. 8 fiber jobs have been identified that will either fortify network transport or extend the network to increase the capacity, reliability, protection and access to scalable broadband and voice service for the benefit of our subscribers. 7 projects have been established that will replace portions of the copper distribution plant with fiber to the home or premise facilities. Fiber distribution facilities provide the most scalable data services capabilities to our residential and business customers.

#### *Network Electronics*

As the demand for data services increases we have identified 7 network electronic upgrades to include Stratum clocks for timing, loop carrier line equipment to aggregate dial tone service for more efficient transport to a new switch which allows us to effectively manage and monitor the data and voice traffic on the network. Additionally, we will replace 4 routers to provide efficient routing of IP based traffic. As broadband demands grow we must ensure our network electronics are not obsolete or creating bandwidth bottlenecks.



#### *Broadband Loop Carriers*

In the next 5 year period Table Top will replace 18 manufactured discontinued Digital Loop Carriers with Broadband Loop Carriers. The new Broadband Loop Carriers will improve our ability to deliver and scale broadband services throughout our network and to the customer. The new equipment will also continue to deliver high quality voice and data circuit services as demand remains steady for these services in each of our wire centers.

#### *Radio Systems*

Table Top Telephone serves a diversity of terrain and low population density areas. We utilize radios to provide interexchange access in some remote areas. 3 obsolete transport radios will be replaced with modern Ethernet radios to increase bandwidth capacity into and out of our wire centers. Many of our business customers continue to utilize special access circuits. We will also deploy 4 canopy radio projects which will be used as wireless loops to reach previously unserved homes where placing facilities are cost prohibitive. Through the use of these canopy radios we are able to provide voice and broadband access to many customers who would otherwise be unserved.

#### *Switching*

We have identified an opportunity to consolidate 4 switches into one new switch. This project will provide a modern switching platform and voice services to 4 of our service exchanges. The new switch will continue to provide reliable access to voice services including enhanced 911 to our customers.

#### *Power Systems*

3 back up power projects have been identified over the next 5 years. While these projects are small in cost they remain critical to ensure our network remains operational during commercial power outages. These projects range from adding battery capacity, a portable generator, and extension of an electrical circuit to a generator.

#### *Routine OSP and Electronic Upgrade*

We have reserved investment for unplanned outside plant and electronic upgrade projects for each wire center. Through our experience we anticipate that projects manifest without forecast. Consistent with our planning goals we will make every effort to replace copper with fiber applications and the necessary electronics to ensure our investment includes the capacity to carry robust broadband services.

Overall our goal is to make prudent investments to maintain and improve our network and services while positioning to build a scalable data centric network that will continue to serve our customers well into the future. We will remain flexible in how best to improve or extend our network over the next 5 years. One thing is clear, we will continue to position our network to fully serve the voice and data demands of our rural customer base. We remain committed to develop network capabilities to bring them affordable and reliable voice and data services.

#### **5 Year Plan Project Management**

In the development of the Table Top 5 Year Plan, we sought to identify our most critical needs to ensure those projects were clearly identified. In the state of Arizona one of the major unknown factors is the impact of state and federal agency requirements for permits, environmental studies, cultural studies and mapping requirements. To this effect, we have identified those projects that may encounter these types of requirements and we will start the projects early in the 5 years cycle even though construction may not take place until year 4 or 5. Additionally, we have sought to balance our projects over the 5

year period based on size, scope and need. This produced a relatively balanced schedule that can more easily be managed by our staff.

We recognize that obstacles and opportunities may present as we deploy our project schedule. We will utilize a process that continuously evaluates the technical solution, cost effectiveness with executive management approval on each project. We will actively manage project obstacles and fully evaluate opportunities to improve our network design. It is important to note, at the current rate of change in technology or capabilities that we remain fluid in understanding our goal to build a reliable, scalable network within our targeted financial budget. In our plan you will also see funds set aside for routine projects that may arise in any given year to extend fiber drops or add electronics to the network where applicable.

The management of Table Top fully understands the dynamics of the network evolution in these uncertain times and is committed to actively evaluate and manage the projects identified in this plan. Table Top will execute this plan by utilizing the following project strategy; technical vetting by our network design team, competitive bidding from vendors, streamlined executive review/approval, positive vendor/agency relationships, project inspection and project closing. The result of the 5 year plan will reflect in improved network reliability, the ability to deliver a variety of scalable data services to end users, a greater percentage of fiber in the network, modern network equipment and the ease of end user access to voice and broadband services.

#### **Highlight of Key Activities by Wire Center**

**AGUILA Wire Center Total Investment: \$467,517**  
**483 voice lines, 27 circuits and 315 broadband services**

2015 Investment \$249,917

The exchange will see the replacement of ½ mile of deteriorated copper cable plant with fiber plant with many advantages over the copper transmission medium to include improved integrity of data transmission, increased capacity and reliability in all operating environments, ease of access to tap the fiber for further extension of the network, the ability to easily scale data capacity for faster response to customer data demands and the capacity to continue to carry voice services. A radio system which supports access out of the exchange will be upgraded to a 300 Mbps Ethernet to increase the capacity for broadband accessibility and data circuits. Loop carrier line equipment will be added to aggregate voice traffic for greater reliability and quality. A network router will replace the end of life model currently deployed for improved network management. \$35,275 reserved for routine projects to improve or increase voice and broadband capacity through the expansion of fiber in the network or the addition of electronics to existing BLC's or customer premise applications such as ONT's.

Area Impact: 306 square miles, population 798.

2016 Investment \$77,350



½ mile of deteriorated copper plant will be replaced with fiber plant with many advantages over the copper transmission medium to include improved integrity of data transmission, increased capacity and reliability in all operating environments, ease of access to tap the fiber for further extension of the network, the ability to easily scale data capacity for faster response to customer data demands and the capacity to continue to carry voice services to reach the Aguila School. Administrators advise us that schools will have a bandwidth requirement per student to facilitate educational opportunities and placing fiber will provide the scalability necessary to adapt to these demands without the need for additional construction. \$37,000 has been reserved for routine projects to improve or increase voice and broadband capacity through the expansion of fiber in the network or the addition of electronics to existing BLC's or customer premise applications such as ONT's.

Area Impact: 61.5 square miles, population 360

2017 Investment \$40,750

No major projects. \$40,750 reserved for routine projects to improve or increase voice and broadband capacity through the expansion of fiber in the network or the addition of electronics to existing BLC's or customer premise applications such as ONT's.

Area Impact: 61 square miles, population 160

2018 Investment \$46,100

No major projects. \$46,100 reserved for routine projects to improve or increase voice and broadband capacity through the expansion of fiber in the network or the addition of electronics to existing BLC's or customer premise applications such as ONT's.

Area Impact: 61 square miles, population 160

2019 Investment \$53,400

No major projects. \$53,400 reserved for routine projects to improve or increase voice and broadband capacity through the expansion of fiber in the network or the addition of electronics to existing BLC's or customer premise applications such as ONT's.

Area Impact: 61 square miles, population 160

**AJO Exchange Total Investment: \$1,778,301**

**1630 voice lines, 94 circuits and 817 broadband services**

2015 Investment \$406,642



The exchange will see a 2 mile replacement of deteriorated copper cable plant with fiber plant with many advantages over the copper transmission medium to include improved integrity of data transmission, increased capacity and reliability in all operating environments, ease of access to tap the fiber for further extension of the network, the ability to easily scale data capacity for faster response to customer data demands and the capacity to continue to carry voice services to 14 households. A 20 year old Stratum clock will be replaced with a modern version to maintain the timing and reliability of the network. A central office radio room will be upgraded with additional frame blocks to increase capacity. A new BLC will be placed to shorten copper loop lengths which will provide faster broadband speeds and more reliable voice services to the area. \$54,075 reserved for routine projects to improve or increase voice and broadband capacity through the expansion of fiber in the network or the addition of electronics to existing BLC's or customer premise applications such as ONT's.

Area Impact: 468 square miles, population 3416

2016 Investment \$495,083

1 mile of deteriorated copper cable will be replaced with fiber plant with many advantages over the copper transmission medium to include improved integrity of data transmission, increased capacity and reliability in all operating environments, ease of access to tap the fiber for further extension of the network, the ability to easily scale data capacity for faster response to customer data demands and the capacity to continue to carry voice services to reach 3 separate locations; the Ajo Sheriff's department, Ajo High School and the Ajo Head Start campuses. School administrators advise us that schools will have a bandwidth requirement per student to facilitate educational opportunities. Law enforcement is also diversifying their communication systems and access to other law enforcement networks. Placing fiber at these locations will provide the scalability necessary to adapt to these demands without the need for additional construction. A network router will replace the end of life model currently deployed for improved network management. 3 new BLC sites will be placed to shorten copper loop lengths which will provide faster broadband speeds and more reliable voice services to the service areas impacted. \$57,300 reserved for routine projects to improve or increase voice and broadband capacity through the expansion of fiber in the network or the addition of electronics to existing BLC's or customer premise applications such as ONT's.

Area Impact: 468 square miles, population 3416

2017 Investment \$62,650

\$62,650 reserved for routine projects to improve or increase voice and broadband capacity through the expansion of fiber in the network or the addition of electronics to existing BLC's or customer premise applications such as ONT's.

Area Impact: 95 square miles, population 845

2018 Investment \$732,426

FTTH project to replace deteriorated copper facilities in the Bud Walker development with fiber plant with many advantages over the copper transmission medium to include improved integrity of data transmission, increased reliability in all operating environments, the ability to easily scale data capacity for faster response to customer data demands and the capacity to continue to carry voice services. FTTH Optical Network Terminals (ONT's) deliver unmatched flexibility to meet the broad service demands of both residential and business subscribers in the networks. The result will be more efficient network management and operation. The ONTs, once installed, can cost-effectively support this without the need for a service call or truck roll. \$70,500 reserved for routine projects to improve or increase voice and broadband capacity through the expansion of fiber in the network or the addition of electronics to existing BLC's or customer premise applications such as ONT's.

Area Impact: Area Impact: 109 square miles, population 1007

2019 Investment \$81,500

No major projects. \$81,500 reserved for routine projects to improve or increase voice and broadband capacity through the expansion of fiber in the network or the addition of electronics to existing BLC's or customer premise applications such as ONT's.

Area Impact: 94 square miles, population 683

**BAGDAD Exchange Total Investment: \$1,927,829**  
**603 voice lines, 58 circuits, and 420 broadband services**

2015 Investment \$26,700

No major project. \$26,700 reserved for routine projects to improve or increase voice and broadband capacity through the expansion of fiber in the network or the addition of electronics to existing BLC's or customer premise applications such as ONT's.

Area impact: 7 square miles, population 375

2016 Investment \$31,000

No major project. \$31,000 reserved for routine projects to improve or increase voice and broadband capacity through the expansion of fiber in the network or the addition of electronics to existing BLC's or customer premise applications such as ONT's.

Area impact: 7 square miles, population 375

2017 Investment \$83,825



A radio system which supports access out of the exchange will be upgraded to a 300 Mbps Ethernet to increase the capacity for broadband accessibility and data circuits. \$33,825 reserved for routine projects to improve or increase voice and broadband capacity through the expansion of fiber in the network or the addition of electronics to existing BLC's or customer premise applications such as ONT's.

Area impact: 13 square miles, population 1876

**2018 Investment \$189,290**

4 separate sections of deteriorated copper facilities will be replaced with fiber plant with many advantages over the copper transmission medium to include improved integrity of data transmission, increased capacity and reliability in all operating environments, ease of access to tap the fiber for further extension of the network, the ability to easily scale data capacity for faster response to customer data demands and the capacity to continue to carry voice services. \$38,100 reserved for routine projects to improve or increase voice and broadband capacity through the expansion of fiber in the network or the addition of electronics to existing BLC's or customer premise applications such as ONT's.

Area Impact: 14 square miles, population 928

**2019 Investment \$1,597,014**

FTTH project to replace deteriorated copper facilities in the Bagdad exchange with fiber plant with many advantages over the copper transmission medium to include improved integrity of data transmission, increased reliability in all operating environments, the ability to easily scale data capacity for faster response to customer data demands and the capacity to continue to carry voice services. FTTH Optical Network Terminals (ONT's) deliver unmatched flexibility to meet the broad service demands of both residential and business subscribers in the networks. The result will be more efficient network management and operation. The ONTs, once installed, can cost-effectively support this without the need for a service call or truck roll. This type of service will allow us to provide a diverse range of services through a single network. \$43,000 reserved for routine projects to improve or increase voice and broadband capacity through the expansion of fiber in the network or the addition of electronics to existing BLC's or customer premise applications such as ONT's.

Area Impact: 36 square miles, population 1876

**INSCRIPTION CANYON RANCH Exchange Total Investment: \$959,756**  
**84 voice lines, 6 circuits and 19 broadband services**

**2015 Investment \$58,500**



A network router will replace the end of life model currently deployed to improve reliability and capacity to serve more data services. \$26,800 reserved for routine projects to improve or increase voice and broadband capacity through the expansion of fiber in the network or the addition of electronics to existing BLC's or customer premise applications such as ONT's.

Area Impact: 7 square miles, population 250

2016 Investment \$785,106

A new voice switch platform will be installed to replace and consolidate 4 manufacturer discontinued switches in the Aguila, Bagdad, ICR and Seligman exchanges through a pre-existing fiber ring which connects the exchanges. This will provide the subscribers of these exchanges with a more reliable voice service, enhanced 911 services and may include the addition of new vertical services such as Centrex and other voice calling features. FTTH projects to replace deteriorated copper facilities with fiber plant with many advantages over the copper transmission medium to include improved integrity of data transmission, increased reliability in all operating environments, the ability to easily scale data capacity for faster response to customer data demands and the capacity to continue to carry voice services. FTTH Optical Network Terminals (ONT's) deliver unmatched flexibility to meet the broad service demands of both residential and business subscribers in the networks. The result will be more efficient network management and operation. The ONTs, once installed, can cost-effectively support this without the need for a service call or truck roll. 1 new BLC will be placed to shorten copper loop lengths which will provide faster broadband speeds and more reliable voice services to the service areas impacted. \$31,125 reserved for routine projects to improve or increase voice and broadband capacity through the expansion of fiber in the network or the addition of electronics to existing BLC's or customer premise applications such as ONT's.

Area Impact: 817 square miles, population 6340

2017 Investment \$33,900

No major project. \$33,900 reserved for routine projects to improve or increase voice and broadband capacity through the expansion of fiber in the network or the addition of electronics to existing BLC's or customer premise applications such as ONT's.

Area Impact: 7 square miles, population 250

2018 Investment \$38,150

No major project. \$38,150 reserved for routine projects to improve or increase voice and broadband capacity through the expansion of fiber in the network or the addition of electronics to existing BLC's or customer premise applications such as ONT's.

Area Impact: 7 square miles, population 250

2019 Investment \$44,100

No major project. \$44,100 reserved for routine projects to improve or increase voice and broadband capacity through the expansion of fiber in the network or the addition of electronics to existing BLC's or customer premise applications such as ONT's.

Area Impact: 7 square miles, population 250

**SANDERS Exchange Total Investment: \$2,781,288**  
**525 voice lines, 37 circuits and 184 broadband services**

2015 Investment \$405,644

13 existing remote carrier sites will be retrofitted to replace equipment that is manufacturer discontinued which will provide faster broadband speeds and more reliable voice services to the service areas impacted. A 20 year old Stratum clock will be replaced with a modern version to maintain the timing of the network. Canopy radio systems will be deployed to reach previously unserved areas of the exchange to increase access of voice and broadband to unserved customers. \$53,300 reserved for routine projects to improve or increase voice and broadband capacity through the expansion of fiber in the network or the addition of electronics to existing BLC's or customer premise applications such as ONT's.

Area Impact: 648 square miles, population 630

2016 Investment \$56,350

No major project. \$56,350 reserved for routine projects to improve or increase voice and broadband capacity through the expansion of fiber in the network or the addition of electronics to existing BLC's or customer premise applications such as ONT's.

Area Impact: 130 square miles, population 126

2017 Investment \$169,594

¼ mile of deteriorated copper cable which serves a school will be replaced with fiber plant with many advantages over the copper transmission medium to include improved integrity of data transmission, increased capacity and reliability in all operating environments, ease of access to tap the fiber for further extension of the network, the ability to easily scale data capacity for faster response to customer data demands and the capacity to continue to carry voice services. School administrators advise us that schools will have a bandwidth requirement per student to facilitate educational opportunities. Providing scalable bandwidth access for broadband services will keep the price as low as possible. A network router will replace the end of life



model currently deployed to improve reliability and capacity to serve more data services. \$61,450 reserved for routine projects to improve or increase voice and broadband capacity through the expansion of fiber in the network or the addition of electronics to existing BLC's or customer premise applications such as ONT's.

Area Impact: 648 square miles, population 630

**2018 Investment \$69,400**

\$69,400 reserved for routine projects to improve or increase voice and broadband capacity through the expansion of fiber in the network or the addition of electronics to existing BLC's or customer premise applications such as ONT's.

Area Impact: 130 square miles, population 126

**2019 Investment \$2,080,300**

This project places 15 miles of fiber to establish a diverse fiber route out of the exchange in order to provide Ethernet transport services which will improve broadband capacity, data scalability and path redundancy with many advantages to include improved integrity of data transmission, increased reliability in all operating environments, ease of access to tap the fiber for further extension of the network, the ability to easily scale data capacity for faster response to customer data demands and the capacity to continue to carry voice services to the entire exchange. \$80,300 reserved for routine projects to improve or increase voice and broadband capacity through the expansion of fiber in the network or the addition of electronics to existing BLC's or customer premise applications such as ONT's.

Area Impact: 648 square miles, population 630

**SELIGMAN Exchange Total Investment: \$1,236,172**  
**322 voice lines, 50 circuits and 152 broadband services**

**2015 Investment \$419,034**

7 existing remote carrier sites will be retrofitted to replace equipment that is manufacturer discontinued to provide faster broadband speeds and more reliable voice services to the service areas impacted. We will also add 1 new BLC site to shorten copper loop lengths which will provide faster broadband speeds and more reliable voice services to the service areas impacted. Loop carrier line equipment will be added to aggregate voice traffic for greater reliability and quality. 2 ¼ miles of fiber placed to extend existing network to previously unserved area reaching 26 remote customers to provide voice and broadband services. \$52,850 reserved for routine projects to improve or increase voice and broadband capacity through the expansion of fiber in the network or the addition of electronics to existing BLC's or customer premise applications such as ONT's.



Area Impact: 855 square miles, population 456

2016 Investment \$105,925

A radio system which supports access out of the exchange will be upgraded to a 300 Mbps Ethernet to increase the capacity for broadband accessibility and data circuits. \$55,925 reserved for routine projects to improve or increase voice and broadband capacity through the expansion of fiber in the network or the addition of electronics to existing BLC's or customer premise applications such as ONT's.

Area Impact: 855 square miles, population 456

2017 Investment \$563,038

½ mile of deteriorated copper plant will be replaced with fiber plant with many advantages over the copper transmission medium to include improved integrity of data transmission, increased reliability in all operating environments, ease of access to tap the fiber for further extension of the network, the ability to easily scale data capacity for faster response to customer data demands and the capacity to continue to carry voice services to subscribers. \$61,050 reserved for routine projects to improve or increase voice and broadband capacity through the expansion of fiber in the network or the addition of electronics to existing BLC's or customer premise application such as ONT's.

Area Impact: 171 square miles, population 255

2018 Investment \$68,650

No major project. \$68,650 reserved for routine projects to improve or increase voice and broadband capacity through the expansion of fiber in the network or the addition of electronics to existing BLC's or customer premise applications such as ONT's.

Area Impact: 171 square miles, population 91

2019 Investment \$79,525

No major project. \$79,525 reserved for routine projects to improve or increase voice and broadband capacity through the expansion of fiber in the network or the addition of electronics to existing BLC's or customer premise applications such as ONT's.

Area Impact: 171 square miles, population 91

Form 481, Section 500 Service Quality Standards & Consumer Protection Rules Compliance  
Sub-Section 510 Narrative (Voice)

Service Quality Standards

Table Top Telephone Company, Inc. ("Table Top") is committed to providing the highest quality service to its subscribers and makes every reasonable effort to comply with applicable service quality standards in accordance with Arizona Corporation Commission Rules.

Consumer Protection

Table Top, complies with the requirements of 47 CFR Part 64 Subpart U, Customer Proprietary Network Information and the Federal Trade Commission's ("FTC") Red Flag Rules 16 C.F.R. §681 to prevent identity theft. A manual for each of those programs is in place and is part of the employees' handbook. All company employees are required to sign and acknowledge that they have completed CPNI and Red Flag training and understand obligations to adherence of applicable rules. Table Top has not experienced any CPNI breaches in the year ending 2013.

Form 481, Section 500 Service Quality Standards & Consumer Protection Rules Compliance  
Sub-Section 510 Narrative (Broadband)

Service Quality Standards

Table Top Telephone Company, Inc. ("Table Top") is committed to providing the highest quality service to its subscribers and makes every reasonable effort to comply with applicable service quality standards in accordance with State and Federal Rules.

Consumer Protection

Pursuant to 47 C.F.R. § 54.313(a)(5) and or 47 C.F.R. § 54.422(b)(3) Table Top is in compliance with applicable FCC Service Quality Standards and Consumer Protection Rules.

Table Top also outlines its rates, terms, and conditions under which Table Top offers Broadband service in NECA Tariff #5 to Internet Service Providers ("ISP"). The Tariff explains customer rights and obligations, customer service, dispute resolution, deposits, billing and payment options, disconnection of service as well as cancellation of service options. Public inspection of NECA Tariff #5 can be found on NECA's website. Retail DSL rates, terms, and conditions for retail services are provided by the ISP.

Form 481, Section 600 Functionality in Emergency Situations  
Sub-Section 610 Narrative (Voice)

**Back-up Power**

Table Top Telephone Company, Inc. has the following back-up power capabilities: Switches, Microwave and Subscriber Carrier (DLC, AFC, OPM, etc.) - See Attachments

**Ability to reroute traffic around damaged facilities:**

Table Top Telephone Company, Inc. ("Table Top") has built a collapsed SONET fiber link from the Ajo Central Office to connecting company's Central Office in Gila Bend. Ajo has a microwave link for diverse path on some DS1 circuits to the connecting company. In addition, in extended emergency situations traffic out of the Ajo exchange can be routed to the Tohono O'odham Tribal Utility fiber. Aguila, Bagdad, and Seligman utilize existing microwave links to connect to the connecting company to get to the toll tandem. Table Top has built a collapsed SONET fiber link between its Aguila and Bagdad central offices. In addition, Table Top has a collapsed SONET fiber link between its Inscription Canyon and Seligman central offices, and an additional collapsed SONET ring between its Inscription Canyon and Bagdad central offices. The Sanders and Inscription Canyon Central Offices have collapsed SONET fiber links to the connecting company.

**Capability to manage traffic spikes resulting from emergency situations**

Table Top Telephone Company, Inc. is capable of managing traffic spikes within its network resulting from emergency situations.

A. Table Top Telephone Company has:

- |                                   |   |
|-----------------------------------|---|
| i. 1,565 customer lines in Ajo    | iv. 302 customer lines in Seligman                |
| ii. 465 customer lines in Aguila  | v. 510 customer lines in Sanders                  |
| iii. 605 customer lines in Bagdad | vi. 72 customer lines in Inscription Canyon Ranch |

B. Table Top Telephone Company has switching capacity of:

- |   |  |
|---|--|
| i. 2,160 simultaneous calls in Ajo      | iv. 928 simultaneous calls in Seligman                 |
| ii. 1,120 simultaneous calls in Aguila  | v. 1,216 simultaneous calls in Sanders                 |
| iii. 1,176 simultaneous calls in Bagdad | vi. 248 simultaneous calls in Inscription Canyon Ranch |

C. Table Top Telephone Company has transport capacity for:

- |                                      |   |
|--------------------------------------|---|
| i. 144 simultaneous calls in Ajo     | iv. 48 simultaneous calls in Seligman                 |
| ii. 154 simultaneous calls in Aguila | v. 120 simultaneous calls in Sanders                  |
| iii. 94 simultaneous calls in Bagdad | vi. 96 simultaneous calls in Inscription Canyon Ranch |



## Table Top Telephone Generators

Exchange	Size	Fuel Type	Capacity	GPH	Days	Estimated Reserve
					Full Time	Battery (hrs)
Aguila CO	50KW	Diesel	100 Gal	4.21	0.98	16
AioCO	100 KW	Diesel	500 Gal	4.1	5.1	16
Bagdad CO	80KW	Diesel	200 Gal	3.8	2.2	16
Childs	35KW	Diesel	250 Gal	4	2.6	72
Chino Point	35KW	Propane	(2) 250 Gal	3.2	5.2	8
Hyde Park	10 KW	Propane	250 Gal	3.2	2.6	12
Lukeville	5KW	Propane	320 Gal	3.2	3.3	16
Mission	8KW	Propane	250 Gal	3.2	2.6	16
North Ranch	10 KW	Propane	250 Gal	3.2	2.6	8
Organ Pipe	16 KW	Diesel	100 Gal	1.34	3.1	16
Parsons	15 KW	Propane	250 Gal	3.2	2.6	8
Sanders CO	75KW	Diesel	250 Gal	6.32	1.6	16
Seligman CO	35KW	Diesel	100 Gal	3.6	1.2	16
TRR CO	85KW	Propane	1,000 Gal	3.2	10.4	16

## Table Top Telephone BLCs & Microwave Sites

BLC or MW site name	Size	FUEL/Type	Fuel Capacity	Estimated Run Time (hrs)	Estimated Reserve Battery (hrs)
Eagle Eye BLC	5KW	Portable Generator	5	10	8
Gladden BLC	5KW	Portable Generator	5	10	8
Long Rifle Rd BLC	5KW	Portable Generator	5	10	8
Highway 71 BLC	5KW	Portable Generator	5	10	8
Forepaugh 1 BLC	5KW	Portable Generator	5	10	16
Abbot Rd BLC	5KW	Portable Generator	5	10	8
Forepaugh 3 BLC	5KW	Portable Generator	5	10	8
Parsons Hut MW	15KW	Propane Generator	250	64	8
North Ranch MW cab	10KW	Propane Generator	250	64	8
North Ranch BLC	5KW	Portable Generator	5	10	16
Fees Rd BLC	5KW	Portable Generator	9	11	16
Synder Rd BLC	5KW	Portable Generator	6.5	13	16
Cunada St BLC	5KW	Portable Generator	9	11	16
Why BLC	5KW	Portable Generator	9	11	16
Organ Pipe	16KW	Diesel Generator	100	75	16
Why Border Patrol	15KW	Customer Diesel Generator	200	48	0
Lukeville BLC	5KW	Propane Generator	320	80	16

BLC or MW site name	Size	FUEL/Type	Fuel Capacity	Estimated Run Time (hrs)	Estimated Reserve Battery (hrs)
Cooper St BLC	5KW	Portable Generator	5	10	8
Sycamore TP BLC	5KW	Portable Generator	5	10	8
Querino Canyon BLC	5KW	Portable Generator	5	10	8
Houck BLC	5KW	Portable Generator	5	10	8
Allentown BLC	5KW	Portable Generator	5	10	8
Hawthorne Rd BLC	5KW	Portable Generator	5	10	8
Lupton BLC	5KW	Portable Generator	5	10	16
Sunset Valley Motorola Canopy	5KW	Portable Generator	5	10	24
Lupton Motorola Canopy	5KW	Portable Generator	5	10	24
Pine Springs BLC	5KW	Portable Generator	5	10	12
AZ Park Estates BLC	5KW	Portable Generator	5	10	12
Rural Community I BLC	5KW	Portable Generator	5	10	16
Rural Community II BLC	5KW	Portable Generator	5	10	16
Horseshoe BLC	5KW	Portable Generator	5	10	16
Chambers BLC	5KW	Portable Generator	5	10	16
Navajo BLC	5KW	Portable Generator	5	10	16
Rim Cabium Canopy	5KW	Portable Generator	5	10	16
Hogan Well Cabium Canopy	5KW	Portable Generator	5	10	16
Parker Draw Cabium Canopy	5KW	Portable Generator	5	10	16
Fort Rock Rd BLC	5KW	Portable Generator	5	10	16
Bridge Canyon BLC	5KW	Portable Generator	5	10	16
Mariposa Ln BLC	5KW	Portable Generator	5	10	16
Mission MW cabinet	8KW	Propane Generator	250	64	16
Mission BLC	8KW	Propane Generator	250	64	16
Hyde Park MW cabinet	10KW	Propane Generator	250	64	12
Hyde Park BLC	10KW	Propane Generator	250	64	12
Inscription Canyon BLC	5KW	Portable Generator	5	10	16

## Form 481, Section 600 Functionality in Emergency Situations

### Sub-Section 610 Narrative (Broadband)

The Table Top's DSLAM's are connected via a fiber ring topology. In most cases the transport traffic path is diverse and at a minimum there is card redundancy in the electronics in the event of a fiber cut or electronic card failure. The network is self-powered and can withstand on average a commercial power outage of 12 hours. Bandwidth out of the wire centers is not diverse. The wire centers can accommodate peak internet traffic as follows:

Aguila, Bagdad, ICR, Seligman	500 Mbps
Ajo	622 Mbps
Sanders	45 Mbps

These networks could withstand a commercial power outage, electronic failure and fiber cut.

## Form 481, Section 900 Tribal Lands Reporting

### Sub-Sections 920 – 923 Tribal Government Engagement Obligation

Table Top Telephone Company, Inc. wrote to Mr. Ben Shelly, President of the Navajo Nation, requesting a meeting to discuss how Table Top Telephone could better service the Navajo Nation's telecommunications needs. After receiving no response to the first written correspondence, a follow up letter was sent to Mr. Shelly. No response was received to either correspondence. Copies of the letters are attached.

### Sub-Sections 924 – 928 Rights of way processes, land use permitting, facilities siting, environmental and cultural preservation review processes

Attached is a copy of a grant of easement for right of way issued to Table Top Telephone Company by the office of Navajo and Hopi Indian Relocation New Lands Branch. This document is an example of Table Top's compliance with this sub-section 924.

To the extent construction activity takes place on Tribal land, Table Top Telephone follows the rules and regulations, processes and procedures, as identified in the Code of Federal Regulations, Title 25, Part 169, and those that may be required by the following entities: Bureau of Indian Affairs, Navajo Nation authorities, and the Office of Navajo and Hopi Indian Relocation New Lands Branch. Table Top is not aware of any violations with regards to activities addressed under sub-sections 925 – 928.

### Sub-Section 929 Tribal Business and Licensing requirements

Table Top Telephone Company provides service within the serving area by authority of our CPCN issued by the Arizona Corporation Commission. As a condition to providing service on Navajo Nation lands, Table Top Telephone has received a Certification of Authority to transact business within the Navajo Nation. A copy of this certifying document is attached for reference.





September 19, 2013

Mr. Ben Shelly, President  
Navajo Nation  
P.O. Box 9000  
Window Rock, AZ 86515-9000

Dear Mr. Shelly,

My name is Matthew Boos, General Manager of Table Top Telephone, and I am writing to request a meeting with you. As technology needs change, Table Top Telephone wants to be in a position to serve the Navajo Nation. While we hope we have been successfully servicing your telecommunications needs, the Federal Communications Commission has asked us to review a few specific items with you to insure we are accomplishing our mutual goals. To this end, we would like to have this first discussion with you.

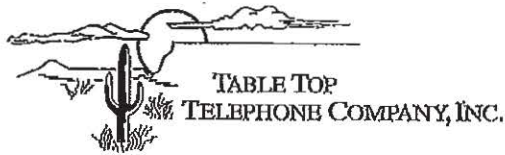
We suggest the following topics as a starting point for our conversation:

- Needs assessment and planning to your anchor institutions,
- Feasibility and sustainability planning,
- Rights of way, permitting, licensing, facility placement, environmental and cultural preservation processes, and
- Development of culturally sensitive marketing materials to your members

I look forward to your reply. You may contact me directly via telephone at 559.868.6322 or via email at [mjboos@ponderosatel.com](mailto:mjboos@ponderosatel.com) to schedule a time to meet.

Best regards,

Matthew J. Boos  
General Manager



November 15, 2013

Mr. Ben Shelly, President  
Navajo Nation  
P.O. Box 9000  
Window Rock, AZ 86515-9000

Dear Mr. Shelly,

My name is Matthew Boos, General Manager of Table Top Telephone, and I am writing to request a meeting with you. As technology needs change, Table Top Telephone wants to be in a position to serve the Navajo Nation. While we hope we have been successfully servicing your telecommunications needs, the Federal Communications Commission has asked us to review a few specific items with you to insure we are accomplishing our mutual goals. To this end, we would like to have this first discussion with you.

We suggest the following topics as a starting point for our conversation:

- Needs assessment and planning to your anchor institutions,
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- Rights of way, permitting, licensing, facility placement, environmental and cultural preservation processes, and
- Development of culturally sensitive marketing materials to your members

I look forward to your reply. You may contact me directly via telephone at 559.868.6322 or via email at [mjboos@ponderosatel.com](mailto:mjboos@ponderosatel.com) to schedule a time to meet.

Best regards,

A handwritten signature in black ink, appearing to read "Matthew J. Boos", with a stylized flourish at the end.

Matthew J. Boos  
General Manager



## Summary of the Project Review Section Navajo Land Department Division of Natural Resources

The Project Review Section of Navajo Land Department is responsible for receiving and processing land use applications for all proposed projects that require tribal review and consideration. These proposed projects on, over and across Navajo lands including: Rights-of-Way, Land Withdrawals, Sand and Gravel Permits, Revocable Use Permits, Temporary Easements, Seismic Surveys, Permission to Survey, Business Site Field Clearance and Leases. Our office coordinates processing with all five BIA agencies, in addition to Alamo, Canoncito and the Ramah Navajo Reservation plus the "New Lands" Area.

All the aforementioned documents must have the following: Letter of Application; Chapter Resolution; BIA Letter of Recommendation; Environmental Assessment; Archaeological Survey and Clearance; Survey Plat; Filing, processing and field clearance Fees; other supporting documents, I.e. Surety bond, appraisal report, and associated permit application, etc.

Project Review Section has two Right-of-Way Agents that conducts all field clearances on proposed projects. They identify landusers and obtained their consent through the District Grazing Committees and/or Easter Land Board Members confirmation.

With the exception of the proposed land withdrawals or proposed business site leases, all application are process through the BIA Agency Real Estate Service Office. Resolutions for proposed land withdrawals can be process directly through the Project Review Section.

Depending upon the completeness of the applications, they average tribal review process from the Division of Natural Resources to the President's Office takes approximately four to six weeks. Delays in processing any proposed project is usually associated with: existing land disputes; failure of the applicant to meet the demands for compensating the affected landusers; refusal of the landusers to grant consent; unavailability of the landusers that have relocated off Tribal lands with no forwarding address; and submittal of incomplete project application. These delays usually take one to four additional weeks to resolve.

A. The Tribal Signature Approval Sheet (S.A.S.) Review process is as follows under the Division of Natural Resources:

1. **Navajo Land Department (NLD)** - Alfred Dehiya, Director (review land status, survey, legal descriptions and comments)
2. **Fish and Wildlife Department (F&W) & Natural Heritage Program** - Gloria M. Tom, Director (review EPA documents for compliance with Federal and Tribal Regulations affecting Threatened & Endangered Species <plants and animals>).
3. **Historic Preservation Department (HPD)** - Dr. Alan Downer, Director (review Archaeological and Cultural Clearances).
4. **Minerals Department (MIN)** - Akhtar Zaman, Director (recommends tribal consideration, rental payment, and royalty rates, etc. On all applications submitted by private entities).



5. **Division of Natural Resources (DNR)** - Arvin Trujillo, Executive Director (reviews and surnames for Division approval based upon programs and departments recommendations).
  6. **Navajo Environmental Protection Agency (NEPA)** - Derrith Watchman-Moore, Executive Director (review Environmental Assessment for compliance with NEPA Regulations as adopted and amended).
  7. **Department of Justice (DOJ)** - Attorneys, Natural Resources Unit
  8. **Office of President and Vice President (PVP)** - Staff Assistant
  9. **Legislative Counsel (LC)** - Attorneys
  10. **Resources Committee (RC)** - George Arthur
- B. S.A.S. Processing involves the following Departments if the proposed development specifically requires their review and surname:
1. **Forestry Department** - Robert Billie, Director
  2. **Agriculture Department** - Elizabeth Washburne, Director
  3. **Parks & Recreation Department** - Clarence Gorman, Director
  4. **Water Development & Maintenance Department** - Johnnie D. Francis, Director
- 
- C. S.A.S. Processing for projects that require funding verification of different account(s) or Intergovernmental coordination requires the review and surname of the following:
1. **Office of Budget and Contract**
  2. **Controller**
  3. **Intergovernmental Relations Committee (IGR)**

**DIVISION OF NATURAL RESOURCES  
Navajo Land Department  
Project Review Section**

**PROJECT APPLICATION PACKAGE**

Project Review Section of Navajo Land Department receives and reviews all project applications. Before the project application package(s) is processed, all documents regarding the project application(s) should be complete and consist of the following:

**A. Letter of Application**

A letter describing the type of project and general location should be submitted (i.e. Right-of-Way, Extensions, Revocable Use Permits, etc.). The letter of application should be submitted to:

Division of Natural Resources  
Project Review Section  
Post Office Box 9000  
Window Rock, Arizona 86515  
Phone: (520) 871-6447/6695

Agency Bureau of Indian Affairs  
Real Estate Service Office

**B. Legal Description/Map**

A map with legal description must accompany the project package. A certified surveyors can conduct this survey. For more information contact:

Mr. Charles Joe, Compliance Officer  
Survey Section/Navajo Land Department  
(520) 871-8402 or 7150

**C. Environmental Assessment (EA)**

An Environmental Assessment, Categorical Exclusion or FONSI must accompany the project package. For more information or assistance contact:

Ms. Derrith Watchman-Moore, Executive Director  
Environmental Protection Administration  
Post Office Box 339  
Window Rock, Arizona 86515  
(520) 871-7692

Rose Dewayne, EP Assistant  
BIA-Environmental Quality Office  
Post Office Box 1060  
Gallup, New Mexico 87305  
(505) 863-8286

**D. Archaeological Survey and Clearance**

An Archaeological Survey and Clearance must accompany the project package. For more information or assistance contact:

Mr. Anthony Klesert, Director  
Navajo Nation - Archaeological Department  
Post Office Box 689  
Window Rock, Arizona 86515  
(520) 871-6540/6541

**E. Other Supporting Documents**

A Chapter Resolution is required.

NOTE: Any Fees or Payments are due at the time of the Project Application Package is submitted.

## DIVISION OF NATURAL RESOURCES PROJECT FEES

Pursuant to Title 16, Navajo Tribal Code, Section 204(12), the following fees are established for services performed by the Division of Natural Resources. Fees are subject to change without notice.

### **A. FEES**

#### **Filing and Processing Fees:**

For the filing and processing of all applications for the use of lands, including, but not limited to business leases, exploration permits, sand and gravel permits, hot plant sites, construction or monitor sites, weather tower sites, microwave and communication sites, rights-of-way, etc.; Fee is per project/site . . . . . **\$300.00**

#### **Surface Clearance Fees:**

For services of Field Agents in performing surface investigations and clearance per day; Minimum Charge . . . . . **\$200.00**. Surface Damage Fees are also estimated by the Field Agent when he/she is conducting the field clearance. (This amount varies).

### **B. PAYMENT**

1. The filing and processing fee is due at the time of application. The fee must be paid in order to have the application filed and processed. **No refunds will be granted.**
2. The surface clearance fees is due at the same time as the filing and processing fee. The per day minimum charge must be paid in advance of surface clearance services. If surface clearance services require more time than the minimum charge, then the additional fee is due at the time of surface clearance completes its work. Surface Damage Fees are also due after the Field Agent completes his work and turns in his/her report with a recommended fee that be compensated to the land user(s), we will notify you if there are any surface damage fees. All surface clearances fees shall be collected prior to official action on the application by the Navajo Nation. Final documents will not be issued until payment is received.
3. A check or money order for the proper amount payable to the Navajo Nation must accompany to each project application.
4. Payment is to be submitted to:

The Navajo Nation  
Division of Natural Resources - Project Review Section  
P.O. Box 9000  
Window Rock, Arizona 86515

### **C. EXEMPTIONS FROM PAYMENT**

1. Chapters of the Navajo Nation
2. Agencies of the Navajo Nation Administration



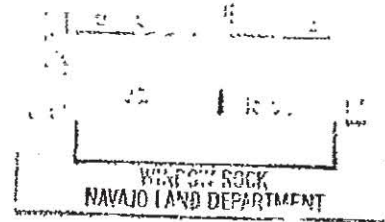


**THE  
NAVAJO  
NATION**

FISH AND WILDLIFE DEPARTMENT, P.O. BOX 1480, WINDOW ROCK, AZ 86515, 520-871-6452

**MILTON BLUEHOUSE  
PRESIDENT**

28 August 1998



Project sponsors;

Enclosed is a list of consultants who have prepared biological evaluations, and have conducted biological surveys for environmental assessments on the Navajo Nation. Inclusion on the list means a consultant has been permitted by the Navajo Fish & Wildlife Department (NFWD) to do surveys in the past, and has done acceptable work. Inclusion on the list does not guarantee quality work in the future. Absence from this list is not necessarily a reflection on a consultant's quality of work.

As soon as possible, project sponsors should advise their consultant(s) to contact the NFWD's Management and Research Section (at 520-871-7068) for a biological investigation permit; and Natural Heritage Section (at 520-871-6472) for a list of threatened and endangered plants and animals in the project area.

A handwritten signature in cursive script, appearing to read "Gloria Notah".

Gloria Notah, Director  
Navajo Fish and Wildlife Department

## BIOLOGICAL CONSULTANTS

Biggs, James  
10324 Apache NE  
Albuquerque, NM 87112  
Contact: James Biggs  
505-298-9446

Biological Survey Services Program  
Navajo Fish & Wildlife Department  
P.O. Box 1480  
Window Rock, AZ 86515  
Contact: Debra Yazzie  
520-871-7070

BIO/WEST, Inc.  
1063 West 1400 North  
Logan, UT 84321  
Contact: S. Blaise Chanson  
801-752-4202

Botanical and Environmental Consulting  
P.O. Box 201  
Flagstaff, AZ 86002  
Contact: Arthur M. Phillips, III  
520-779-2288

Cedar Creek Associates, Inc.  
916 Willshire Avenue  
Fort Collins, CO 80521  
Contact: Mike Phelan  
Steven Vieri  
970-493-4394

CSWTA, Inc.  
P.O. Box 790  
Tuba City, AZ 86045  
Contact: Carol S. Yazzie Ward  
Stephen L. Ward  
520-283-4323

Dames & Moore  
Cambrie Corporate Center  
1790 E. River Road; Suite E-300  
Tucson, AZ 85718-5876  
Contact: Linwood Smith  
Kim Otero  
520-529-1141

Eagle Ecological Services  
30 Fonda Road  
Santa Fe, NM 87505  
Contact: Dale W. Stahlecker  
505-982-4692

Ecosphere Environmental Services  
5850 E. Main; Suite B  
Farmington, NM 87402  
Contact: Mike Eisenfeld  
505-327-3088

Ecosystem Management, Inc.  
4004 Carlisle NE; Suite C1  
Albuquerque, NM 87110  
Contact: Bill Hevron  
Mike Tremble  
505-884-8300

ENSR Consulting and Engineering  
1601 Prospect Parkway  
Fort Collins, CO 80525  
Contact: Phil Hackney  
Jon Alstad  
970-493-8878

Intermountain Ecosystems  
270 E 1230 N  
Springville, UT 84663  
Contact: Ron Kass  
801-489-4590

Marron & Associates, Inc.  
7809 Fourth Street, NW  
Albuquerque, NM 87107-6526  
Contacts: Ken Marron  
Paul Knight  
505-898-8848

Metric Corporation  
8429 Washington Place NE; Suite A  
Albuquerque, NM 87113  
Contact: Pete H. Metzner  
505-828-2801

R.B. Duncan & Associates  
7441 Calle Maicoba  
Tucson, AZ 85710  
Contact: Russell Duncan

SWCA, Inc.  
114 N. San Francisco St.; Suite 100  
Flagstaff, AZ 86001  
Contact: Stephanie Treptow  
520-774-5500

## ENVIRONMENTAL ASSESSMENT CONSULTANTS

Mr. Tom Rice  
ALTA  
20839 C.R. W  
Lewis, Colorado 81327  
Phone No. (303) 882-2467

Mr. Robert Crabb  
IINA BA  
3005 Northridge, Suite J  
Farmington, New Mexico 87401  
Phone No. (505) 327-1072

Mr. James Turquaoise, Environmental Specialist II  
Capital Improvement Program (CIP) Department  
Navajo Nation/Division of Community Development  
Window Rock, Arizona 86515  
Phone No. (520) 871-6174 or 6509

Benjamin Bennett  
Professional Services Associates  
P.O. Box 388  
Window Rock, Arizona 86515  
Phone No. (520) 729-5937

Mr. Brian Wood  
Permits West Inc.  
17 Verano Loop  
Santa Fe, New Mexico 87505  
Phone No. (505) 466-8120

J.R. Analla  
P.O. Box 1034  
Gallup, New Mexico 87305  
Phone No. (505) 863-3943



**SAMPLE**

OFFICE OF THE PRESIDENT  
THE NAVAJO NATION

DNR-\_\_\_\_\_

SIGNATURE APPROVAL SHEET

FROM: DIVISION OF NATURAL RESOURCES - Project Review Section  
Howard Phillip Draper

Exts: 6447 or 6695

\*\*\*\*\*

DOCUMENT:

DATE: \_\_\_\_\_

\*\*\*\*\*

**S U R N A M E:**

1.	NLD:	_____	DATE: _____
2.	F&W:	_____	DATE: _____
3.	HPD:	_____	DATE: _____
4.	MIN:	_____	DATE: _____
5.	EPA:	_____	DATE: _____
6.	DNR:	_____	DATE: _____
7.	DOJ:	_____	DATE: _____
8.	PVP:	_____	DATE: _____
9.	LC:	_____	DATE: _____
10.	RC:	_____	DATE: _____

\*\*\*\*\*

Date signed _____	# of Signature(s) _____	Disposition _____	Initial _____
PVP OFFICE	ORIGINATING DEPARTMENT		DNR FILES

DEPARTMENTS:

Navajo Land Department  
Fish & Wildlife Department  
Historic Preservation Department  
Minerals Department  
Environmental Protection Agency  
Division of Natural Resources  
Department of Justice  
President & Vice-President Ofc.  
Legislative Counsel  
Resources Committee

DIRECTORS:

Alfred Dehiya  
Gloria M. Tom  
Dr. Allan Downer  
Akhtar Zaman  
Derrith Watchman-Moore  
Arvin Trujillo  
Attorney/NRU  
Staff Assistant  
Legislative Staff  
George Arthur, Chairperson

TELEPHONE NO.

6401/6502  
6451/6542  
6437/7148  
6587  
7692/7751  
6592/6592  
6343/6344/6345  
6353/6354/6355  
7166  
6382/6383

Others Departments:

Parks & Recreation  
Agricultural Department  
Water Resources Department  
Forestry Management Office

Clarence Gorman  
Eliza-Beth Washburne  
Johnnie Francis  
Robert Billie

6636, 6647  
6605  
(520) 729-4003  
(520) 729-4007

_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____



NAVAJO NATION

# ARCHAEOLOGY



CONDUCTS  
ARCHAEO-  
LOGICAL  
SURVEYS FOR  
NAVAJO  
SPONSORS AT  
THE LOWEST  
COST

PROTECTS  
NAVAJO  
CEREMONIAL  
& SACRED  
PLACES FROM  
THE EFFECTS  
OF DEVELOP-  
MENT

The Archaeology Department is the only organization whose mission

is to provide archaeological field services to all the Navajo people.

We have offices in Window Rock, Farmington and Flagstaff in order  
to provide the most effective services. CALL US @ 520-871-6540.

NNAD • Box 689 • Window Rock, AZ 86515

-PLEASE POST-



# BIOLOGICAL EVALUATIONS

FOR LAND-USE ACTIONS ON THE NAVAJO NATION

SUMMARY

SEPTEMBER 1997

Proposed land-use actions (projects) on the Navajo Nation require an evaluation of the action's impact on *biological resources of concern*, which encompass fish and game to federally listed threatened and endangered (T&E) species and habitat. Evaluations must be reviewed by the Navajo Fish & Wildlife Department (NF&WD) before project approval by the Navajo Nation Council, Resources Committee, Navajo Nation President, or their delegatee. Length and depth of an evaluation depend on its subject. An evaluation may be part of another document, such as an EA. The evaluation must include, but should not necessarily be limited to:

PROJECT NAME (and NUMBER, if applicable).

PROJECT DESCRIPTION: Type, components, dimensions.

PROJECT LOCATION: Legal description, UTM coordinates, and/or distance to a landmark - must match the legal survey description.

MAP: Plot the project on a map (USGS 7.5 minute topographic map, preferably) - must agree with the legal survey map.

RESEARCH: How were biological resources of concern determined for the project area? See below. A biological survey is usually necessary. (Surveys must be permitted by the Director, NF&WD. See below.)

ANALYSIS: How will biological resources be impacted, directly, indirectly and cumulatively, by the project? This analysis must be based on relevant information and follow a clear line of reasoning.

AVOIDANCE: Are changes to the project needed to avoid take<sup>1</sup> of *tribally listed endangered species* or effect<sup>1</sup> on *federal T&E species/habitat*?

COORDINATION/CONSULTATION: This is required if take or effect are not avoided. Contact the NF&WD and U.S. Fish and Wildlife Service.

MITIGATION: What project changes are required (by law, regulation, etc.) to *off-set* taking tribally listed species, or affecting federal T&E species/habitat, or significantly impacting other *biological resources*? Will voluntary measures to conserve biological resources be implemented?

EVALUATION PREPARER: name, telephone number and qualifications.

A copy of "Navajo Nation Biological Evaluation Guidelines" is available free, from the Navajo Natural Heritage Program (NNHP), NF&WD, P.O. Box 1480, Window Rock, AZ, 86515; (520) 871-6472. In preparing an evaluation the following personnel can be contacted for information:

DATA MANAGER, NNHP - location and status of biological resources of concern (see attached information request procedures).

BOTANIST, NNHP - rare and T&E plant biology/conservation.

ZOOLOGIST, NNHP - rare and T&E animal biology/conservation.

ENVIRONMENTAL REVIEWER, NNHP - environmental law, evaluation preparation, analysis of effect, avoidance/mitigation measures.

WILDLIFE BIOLOGIST, Research/Management Section, NF&WD (871-6451/2) - biology and conservation of fish and game species; issuance of biological investigation (survey) permits (procedures attached).

ATTACHMENTS:       (1) INFORMATION REQUEST PROCEDURES  
                      (2) BIOLOGICAL INVESTIGATION PERMITTING PROCEDURES

<sup>1</sup> See Navajo Nation Code §500(A), and 50 Code of Federal Regulations § 402.02



## **PROCEDURES & FEES FOR INFORMATION REQUESTS**

**Navajo Natural Heritage Program (NNHP)**

**January 1996**

**Information Requests (IRs) = Requests for information on the occurrence/potential occurrence of species of concern at potential project sites on the Navajo Nation.**

### ***PROCEDURES***

**A. Submit IRs to:**

Data Manager  
Natural Heritage Program  
Navajo Fish & Wildlife Department  
P.O. Box 1480  
Window Rock, Navajo Nation, AZ 86515  
(520) 871-7603

**B. IRs must include the following items:**

1. Written request. IRs must be in writing. Processing of an IR may begin if a verbal request is made (provided items 2 and 3 are met), however, a response will not be provided until a written request is received. Please refer to each project by a specific name and number (if available), as that eliminates the potential for confusion during correspondence.
2. Project summary. A summary of the proposed project is necessary so an IR can be adequately reviewed. Biological concerns may vary depending on factors such as the project size, type and location, the length and time of construction, etc. Project summaries should be as specific as possible, but not excessively long or detailed.
3. Maps. A map of the area with the project site clearly delineated is essential. Processing of an IR will not begin until maps are received. Reproductions of USGS 7.5-minute topographic maps are highly preferred. Please include the quadmap name on all topographic map reproductions. If topographic maps are not available, maps must have a scale and some type of geographic reference point(s) so the project location and dimensions can be easily and accurately identified.

- C. The NNHP will respond to IRs within 15 working days of receipt. "Standard" responses will consist of (1) species known to occur at or near the potential project site, and (2) species having the potential to occur anywhere on the USGS 7.5-minute quadmap(s) containing the project boundaries. Your project biologist should have the expertise to determine which of the quad-specific species listed have the potential to occur at the particular project site. Projects determined by the NNHP staff to be of a particularly sensitive nature with regards to biological issues (based on the project summary and map) will include a more detailed response than the "standard".**

**NOTE: The absence of any one of the three items listed above in B will lengthen the processing time.**

### **FEES\***

\$50 per request (includes the first four USGS 7.5-minute quadmaps reviewed); plus \$5 for each additional USGS 7.5-minute quadmap reviewed.

Separate projects will be considered separate requests. If a single letter solicits information on more than one project, a separate fee will be charged for each project.

The Navajo Division of Finance will issue an invoice to the requestor a short time after the NNHP provides a letter of response.

\*Fees are waived for IRs from agencies of the Navajo or United States governments.

### **ADDITIONAL INFORMATION**

- A. For each species included in a letter of response, the following tribal and federal statuses will be indicated: Navajo Endangered Species List (NESL), federal Endangered Species Act (ESA), federal Migratory Bird Treaty Act (MBTA), and federal Eagle Protection Act (EPA). Information will not be provided on state status. Species included which do not occur on any Navajo, federal, or state listing or species with only ESA candidate or NESL group 4 status have no legal protection and will be included for project planning and information gathering purposes only.
- B. The U.S. Fish & Wildlife Service's National Wetlands Inventory (NWI) maps must be examined to determine whether areas classified as wetlands are present or absent at potential project sites. In cases where the maps are inconclusive (e.g., due to their small scale), field surveys must be completed. For field surveys, wetlands identification and delineation methodology contained in the "Corps of Engineers Wetlands Delineation Manual" (Technical Report Y-87-1) should be used. When wetlands are present, potential impacts must be addressed in an environmental assessment and the U.S. Army Corps of Engineers, Phoenix office, must be contacted. NWI maps are available for examination at the NNHP office, or may be purchased through the U.S. Geological Survey (order forms are available through the NNHP). The NNHP has complete coverage of the Navajo Nation, excluding Utah, at 1:100,000 scale; and coverage at 1:24,000 scale in the southwestern portion of the Navajo Nation.

The procedures for handling wetlands issues may change in the near future because the Navajo Nation is in the process of developing regulations regarding impacts to wetlands. These regulations are tentatively called the "Navajo Nation Aquatic Resources Protection Program." A questionnaire, to be used in conjunction with the NWI maps for the preliminary assessment, may be a requirement under these regulations.

- C. The information provided in a letter of response is based on existing data known to the NNHP at the time of the IR. The information should not be regarded as a final statement on the occurrence of any species of concern nor should it substitute for on-site surveys for species. Also, because the NNHP database is continually updated, any given response is only wholly appropriate for its respective request.





# THE NAVAJO NATION

**ALBERT A. HALE**  
PRESIDENT

**THOMAS E. ATCITTY**  
VICE PRESIDENT

## **PERMITTING PROCEDURES AND QUALIFICATIONS FOR BIOLOGICAL INVESTIGATION ON THE NAVAJO NATION.**

### **A. Application procedures:**

Applicant must submit to the Director, Navajo Fish and Wildlife:

1. A letter explaining the purpose of the Biological Investigation or Scientific Collection. Include association with the appropriate institution or agency (e.g. university, consulting firm, state agency) if the project is sponsored or contracted by them.
2. A completed application for a Scientific Collecting/Biological Investigation Permit, with the following attachments:
  - a) For Biological Investigations, a study plan including methods, duration and location(s). Indicate location(s) on a USGS Topographic map or a reasonable facsimile.
  - b) For Scientific Collecting, submit a study plan, including collection procedures, locations, target species, number of specimens and proposed final disposition of specimens.
3. Applicant's resume with qualifications relevant to the proposed study. A verification of association with a federal or state natural resource agency may substitute for a resume (e.g. Biologist with a state Game and Fish Dept.).

### **B. Stipulations:**

1. Permits are issued to an individual (the permittee); permits are not issued in the name of a company or group of people. Permit conditions and authorizations are the sole responsibility of the permittee. Subpermittees may be authorized under the permit **only if** they are under the direct supervision of the permittee. Submit resumes of subpermittees.
2. Permits are issued only for planned biological investigations; permits are not issued for the purpose of securing a bid.
3. Upon completion of the study, the permittee must submit to the Director:



- a) A copy of compiled data before inclusion in the final report. This may be in the form of field notes, or a separate report, including transcribed field notes, species lists, maps, etc.
- b) A copy of the final report.
- c) A specified number of voucher specimens of each species collected, properly prepared and labeled according to standard scientific convention, if required on the permit.

4. Permits are issued for a specified amount of time, covering the duration of the study. Should the study continue into a new calendar year, the permittee must apply for a new permit.

#### C. Qualifications:

1. Minimum of bachelor's degree in one of the life sciences (e.g. ecology, botany, zoology) including relevant course work, and/or sufficient field experience related to the proposed study.
2. Familiarity with the local flora and fauna. Depending on specifics of the study, applicant must have knowledge of local ecology and/or be familiar with plant and animal species in the area of study; this may include threatened and endangered (T&E) species. Detailed knowledge of T&E species is not required to conduct preliminary investigations. However, should the study reveal potential for the presence of T&E species, any subsequent, in-depth work must be conducted by individuals with specific knowledge of and experience with the species in question. Appropriate federal permits must also be secured prior to field work.

#### D. Biological Reconnaissance:

1. This type of study involves gathering basic biological data such as identifying the biotic community, common species, and other biologically relevant information. General information relevant to species of concern (e.g., presence/absence of potential habitat) can be gathered in a reconnaissance; however, results of a reconnaissance may not be conclusive, and determinations about the presence/absence of a species may need to be confirmed by a qualified biologist. If the purpose of the study is to survey for a species or assess habitat quality then a permit is required.
2. A permit is not required for reconnaissance, but the individual must have; a general knowledge of field biology; ability to identify common animals, plants and vegetation type; objectivity in reporting findings; average or better, observational skills; and familiarity with permitting procedures.

**NOTE:** Permit processing takes a minimum of two weeks. If the application is incomplete or information is missing from attachments, then processing will take longer. Failure to comply with these procedures can result in delays in processing applications and may result in permit revocation.



**OPEN DUMPS:** The Navajo Nation has inventoried more than 400 large open dumps. By definition, an open dump is one that is actively being used by three or more families. There is a significant number of smaller dumpsites, such as backyard single household dumps. The majority of the residents and some businesses practice open dumping and burning of their trash. Entities such as the Indian Health Service have their waste transported off the reservation to permitted landfills through waste disposal service contracts. It is required for all businesses, industries, and large organizations to contract out their waste, this includes all companies and contractors doing business on the reservation. All open dumps must close by October 9, 1997 as mandated by the United States Environmental Protection Agency federal criteria for municipal solid waste landfills (MSWLF), outlined in 40 Code of Federal Regulations Part 257 and 258. The Navajo Nation does not have any landfills which meet the federal criteria for municipal solid waste landfills, which include methane gas and groundwater monitoring systems, leachate collection, and having a non-permeable liner. A landfill of this caliber is very expensive to build and maintain. The Solid Waste Management Program is currently assisting chapters in establishing an alternative waste disposal method, either through collaborating with IHS to construct transfer stations, through grants available from Farmers Home Administration under the U. S. Department of Agriculture, or by placing solid waste disposal bins at chapter locations. Once an alternative is established, the community must begin closure and clean-up activities of all existing open dumps. Within one year of the October 1997 deadline, a final cover must be installed on all sites closed.

**OPEN TO BINS:**

Made of metal, these bins come in variety of sizes, ranging from 3 cubic yards to 40 cubic yards. Bins can be placed on chapter withdrawn land and do not require land withdrawals, surveys, or other clearances. Usually, the waste disposal contractor can provide a chapter a bin. A bin is "pulled", meaning the contractor will pull the bin using a roll-off hoist truck which can hydraulically pull a filled bin onto the truck bed, or "roll-off" an empty bin onto the ground. Some bins have rubber lids, and others have no lids at all. When the contractor pulls a bin, it will be covered during transport to the permitted landfill. The small 3 cubic yard bins are usually picked up by a front end loader type fork lift Garbage truck which lifts the bin over the cab and empties the waste into the trash compacting unit. Then the bin is placed back down after unloading.

**TRANSFER STATIONS:**

These facilities consist of a ramp which is adjacent to the solid waste disposal bins, nearly level with the height of the bin. The ramp is for accessibility for transfer station customers. There may be a caretaker office, fencing around the site, signs, recycling bins, and electrical power for the compacting unit. Transfer stations are built to temporarily store household waste until it can be transported to a permitted landfill. It is very convenient for rural communities where residents can bring their trash to a central location. Transfer stations charge a tipping fee collected by the caretaker or site personnel, which allows customers to use the facility. Charges range from .25 cents to \$5.00, or customers may pay a monthly/yearly fee

# **Your guide to SOLID WASTE on the Navajo Nation**

Navajo Nation  
Environmental Protection  
Agency  
Solid Waste Management  
Program  
P.O. Box 339  
Window Rock, Arizona 86515

Telephone  
(520) 871-7751, 7757

Telefax  
(520) 871-7818

Toll-free  
1-800-224-3056



## Navajo Nation Environmental Protection Agency Mission Statement:

"With respect to Dine values, protect, preserve, and enhance public health, welfare, and the environment for future generations by developing, implementing, and enforcing strong environmental laws; and by fostering public awareness and cooperation through education and motivation."

### Solid waste on the Navajo Nation:

With a lack of alternative waste disposal facilities such as open top bins and transfer stations, open dumping and burning of trash is rampant and on-going. Trash is littered along all our dirt roads, highways, in ditches, arroyos, or open pits. A vast majority of residents continue to utilize their backyards as disposal sites, with many people burning their trash in 55 gallon metal drums. Larger communities have landfills (open dumps) which do not meet the federal criteria for municipal solid waste landfills. Trash is the most visible problem facing the Navajo Nation today. It is everywhere.

### NAVAJO NATION SOLID WASTE LAWS:

In 1990, the Navajo Tribal Council through resolution CO-58-90 approved and adopted the Navajo Nation Solid Waste Code. The Code asserts authority over all persons within the territorial jurisdiction of the Navajo Nation which affect the generation, collection, storage, transportation, and disposal of solid waste. Basically, open dumping of trash is prohibited.

### What is the purpose of these laws?

To protect the health and welfare of our people, our natural resources, and our Navajo Nation environment.

### Where can I take my trash for proper disposal?

You can take your trash to your nearest transfer station or open top bin located in the following communities:

#### TRANSFER STATION LOCATIONS:

Pinon, Arizona  
Fort Defiance, Arizona  
Ramah/Pinehill, New Mexico  
Pinedale, New Mexico  
Tohatchi, New Mexico  
Breadsprings, New Mexico  
Coyote Canyon, New Mexico  
Churchrock, New Mexico  
Crownpoint, New Mexico  
Red Rock, New Mexico  
Prewitt, New Mexico  
Canoncito, New Mexico

#### OPEN TOP BIN LOCATIONS:

Oak Springs chapter, Oak Springs, AZ.  
Lupton chapter, Lupton, AZ.  
Houck chapter, Houck, AZ.  
St. Michaels chapter, St. Michaels, AZ.  
Dennehotso chapter, Dennehotso, AZ.  
Red Mesa chapter, Red Mesa, AZ.  
Aneth chapter, Aneth, Utah  
Mexican Water chapter, Mexican Water, AZ.  
Oljato chapter, Oljato, Utah  
Navajo Mountain chapter, Navajo Mountain, Utah  
Shonto chapter, Shonto, AZ.  
Dilkon chapter, Dilkon, AZ.  
Huerfano chapter, Huerfano, New Mexico  
Greasewood chapter, Greasewood, AZ.

Note: Construction of proposed transfer stations and placement of open top bins at other locations are pending and on-going.

Do I have to pay to dispose of my household trash at these locations? Yes, tipping fees are charged to all users. Fees range from .25 cent per trash bag to \$1.00 per trash bag. Charge for pick-up loads range from \$3.00 to \$5.00. Some facilities charge a monthly user's fee ranging from \$3.00 to \$5.00, or a yearly fee ranging from \$10.00 to \$25.00. Tipping fees are posted at each location.

### Does the Navajo Nation have a permitted landfill?

No, there are no permitted landfills or USEPA complying landfills on the reservation.

### What can I do to help clean up my community and keep it clean?

Start using the transfer stations and open top bins to dispose of your trash. Spread the word around to your relatives, neighbors, friends, businesses, and the public. These facilities provide you with an alternative disposal as opposed to just dumping your trash anywhere.

### What about recycling?

We can reduce the total volume of our solid waste stream by recycling items such as aluminum, glass, plastics, cardboard, paper products, office and xerox paper, tin cans, and other recyclables (look for the three arrow symbols on products, these packages or containers are recyclable).

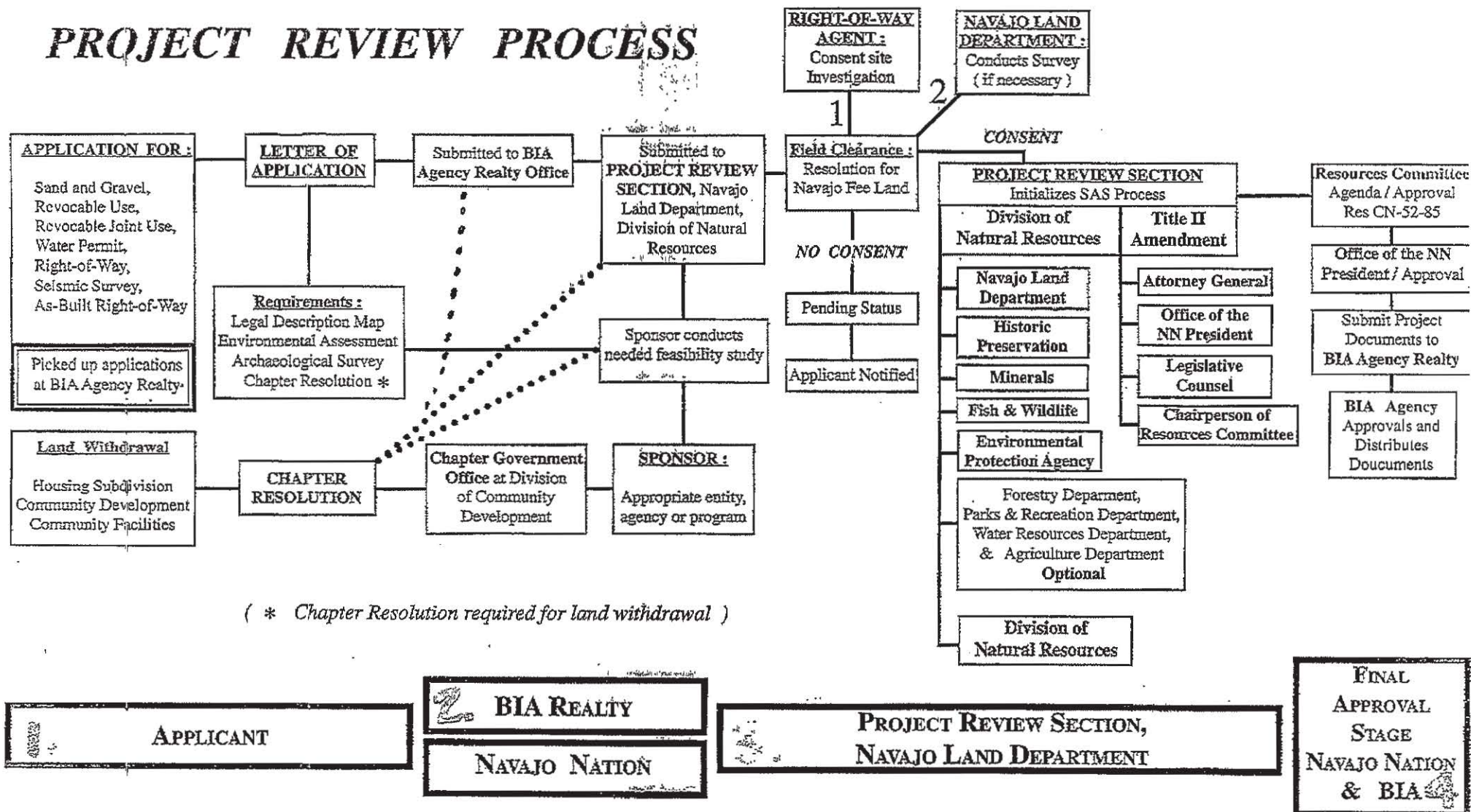
### Where can I take my recyclables?

Some chapters have implemented recycling collection. You can take your recyclables to border towns which have recycling centers. You will be helping the environment and less is landfilled, but is reused or made into new products.

**TO REPORT ILLEGAL TRASH DISPOSAL  
CALL OUR OFFICE AT 1-800 224-3056**



# PROJECT REVIEW PROCESS



( \* Chapter Resolution required for land withdrawal )

OFFICE OF NAVAJO AND HOPI INDIAN RELOCATION  
NEW LANDS BRANCH

GRANT OF EASEMENT FOR RIGHT-OF-WAY

**KNOW ALL MEN BY THESE PRESENTS:**

That the United States of America for and on behalf of the Indian Owners of the lands described in Exhibit A hereof, acting by and through the Executive Director, Office of Navajo and Hopi Indian Relocation, Flagstaff, Arizona, hereinafter referred to as "Grantor", under authority contained in Public Law 99-190 and Public Law 93-531, as amended by Public Laws 96-305 and 100-666, and pursuant to the provisions of the Act of February 5, 1948, (62 Stat. 17, 25 U.S.C. §323-328), and Part 169, Title 25, Code of Federal Regulations, does hereby grant to:

Table Top Telephone Company, hereinafter referred to as "Grantee," an easement for right-of-way for the following purpose(s), namely: construction of a telephone system over, across, in and upon the following described lands located in the County of Apache, State of Arizona. The said easement, as described in Exhibit A, attached hereto, is limited to and more particularly described as:

Thru Navajo Tribe Trust Lands located in the Section 10, Township 19 North, Range 27 East and Lot 4 of Section 30, Township 19 North, Range 27 East, Gila and Salt River Meridian, Apache County, Arizona. Further description as shown on attached Exhibit A.

This easement is subject to any valid existing right or adverse claim, is limited to a 99 year term ending on May 20, 2110 PROVIDED, that this right-of-way shall be terminable in whole or in part by the Grantor for any of the following causes upon 30 days written notice and failure of the Grantee within said notice period to correct the basis for termination (25 CFR 169.20):

- A. Failure to comply with any term or condition of the grant of the applicable stipulations shown in Exhibit B.
- B. A non-use of the right-of-way for a consecutive two year period for the purpose for which it was granted.

- C. An abandonment of the right-of-way.
- D. Failure of the Grantee, upon completion of construction, to file with the Grantor an affidavit of completion pursuant to 25 CFR 169.16.

The conditions of this easement shall extend to and be binding upon and shall inure to the benefit of the heirs, representatives, successors and assigns of the Grantee.

IN WITNESS WHEREOF, Grantor has executed this grant of easement this 24 day of 5 2011.

THE UNITED STATES OF AMERICA

By



Christopher J. Bavasi

Executive Director

OFFICE OF NAVAJO AND HOPI INDIAN RELOCATION  
P.O. Box KK  
Flagstaff, Arizona 86002

Exhibit A: Description of ROW

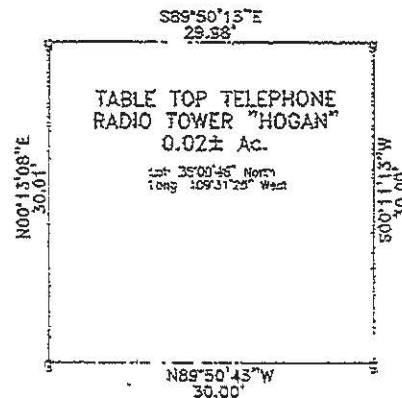
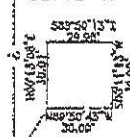
Exhibit B: ROW Stipulations





A RECORD OF SURVEY  
for  
TABLE TOP TELEPHONE  
RADIO TOWER SITE  
LOCATED IN THE  
LOT 4 of SECTION 30,  
TOWNSHIP 19 NORTH, RANGE 27 EAST, G&SRM  
NAVAJO SPRINGS, APACHE COUNTY, ARIZONA

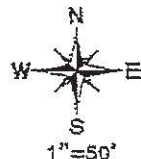
DETAIL "A"



DETAIL "A"  
Not to Scale

S25 1/2 S30  
S41

At 1/22-44  
1945 Brass Cap  
Section Corner  
Lat. 45°08'45.5" North  
Long. 109°21'26.75" West



NOTES:

BASIS OF BEARING - Solar Observation 11-16-10 A.M.

g DENOTES SET 1/2" ± 18" REBAR  
with PLASTIC CAP: NWPLS # 12163/AZPLS#29594  
Lease area is vacant.

Project Site

Legal Description

A parcel of land located in lot 4 of Section 30, Township 19 North, Range 27 East, Gila and Salt River Meridian, Apache County, Arizona situated in the Navajo Springs area and being more particularly described as follows:

Beginning at the Southwest corner of said parcel a point which bears North 67°27'20" East, a distance of 1,354.67 feet from the Southwest corner (SW) of said Section 30;

thence North 00°3'08" East, a distance of 20.31 feet;  
thence South 89°50'13" East, a distance of 29.98 feet;  
thence South 00°11'13" West, a distance of 30.00 feet;  
thence North 89°50'43" West, a distance of 30.00 feet to the Point of Beginning. Containing 0.0207 Acres, more or less.

I, Henry Thomas, Arizona Registered Surveyor, do hereby certify that this Plat was prepared from actual ground survey performed by me or under my direct supervision, and am responsible for this survey, that this survey is true and correct to the best of knowledge and belief, that this Plat and the field survey upon which it is based meet the Minimum Standards for Surveying in Arizona and also in accordance with the Navajo Area Real Estate Services Survey Requirement Policy.

Henry Thomas AZPLS Lic No 29594

Date

RED VALLEY SURVEY		Drawn By
A RECORD OF SURVEY of the		PLS#
TABLE TOP TELEPHONE		DATE
RADIO TOWER "HOGAN"		SCALE
0.021 Ac.		
Lot 4 of Sec. 30, T19N, R27E, G&SRM		
Navajo Springs, Apache County, Arizona		

RYS#10-114

OFFICE OF NAVAJO & HOPI INDIAN RELOCATION

LAND CLEARING, EXCAVATION AND RECLAMATION  
STIPULATIONS FOR RIGHT-OF-WAY

1. Written Notification of Major Activity Status  
Grantee will furnish written notification to the Commissioner as follows:
  - a. A minimum of five (5) working days prior to commencement of construction, seeding and major soil-disturbing maintenance on the right-of-way.
  - b. A maximum of 10 working days following completion of construction, seeding and major maintenance.
2. Confinement of Activities to Right-of-Way  
All vehicular traffic will be confined to existing roadway and/or within the right-of-way as granted, except as provided in Section 4 below or as specified by the Commissioner.
3. Line and Road Locations  
Where possible, the utility will be constructed adjacent to the area cleared for an access road and/or other right-of-way.  
Other routes will be used, if necessary, to minimize visual impact as authorized by the Commissioner.
4. Roads Only Where Necessary  
In areas where the right-of-way does not have permanent access, roads will not be constructed within the right-of-way when terrain will allow vehicles to maneuver without such roads.
5. Clearing and Grading  
Clearing, grading and other soil and vegetation disturbance will be limited to the minimum required for construction.  
Clearing of brush or shrub-type vegetation beneath aerial will be limited to severing the tops of that vegetation. Established vegetation will be removed only where necessary for the construction of roads, buildings, poles, towers or other surface structures. In no event will herbicides be used without the written permission of the Commissioner.
6. Tree and Brush Disposal Requirements  
Unless otherwise specified by the Commissioner, the following tree and brush disposal requirements shall be in effect:
  - a. All cleared woody material 4 inches in diameter or less inside the bark at the small end will be considered as brush or slash and disposed of by piling and burning at a safe distance from surrounding vegetation or by chipping in portable chippers unless other disposal methods are specified.
  - b. All straight cleared woody material between 4 and 7 inches diameter inside the bark at the small end will be trimmed of smaller branches, cut into straight 7 foot pieces and piled on or adjacent to the right-of-way for utilization by the Navajo people.
  - c. All straight cleared woody material 7 inches or more in diameter inside the bark at the small end will be trimmed of all limbs and branches, sawed into 16 foot 6 inches straight saw log lengths and piled into log decks at locations accessible by logging trucks and loaders.
  - d. All other woody materials will be disposed of in accordance with Section 6a above. Grantee shall obtain a burning permit from the ONHIR before burning any debris, trees or brush in forested areas.



7. Trenches and Excavations

Trenches and other excavations shall be left open for the minimum period of time compatible with construction requirements. Materials removed during construction must be backfilled or disposed of in such a manner as to prevent concentration of water runoff which would cause accelerated erosion and prevent rows or piles of rubble or large rock that would hinder movement of livestock or big game animals or detract from scenic attributes.

8. Depth and Coloration of Underground Utilities

Underground utilities will be covered to a depth of 3 feet or as specified by engineering standards and requirements, whichever is greatest. Where such depths are not feasible, the utility shall be placed on or elevated above the surface as specified by engineering standards and requirements. When placed on or above the surface, the utility will be painted to blend with the natural surroundings using the indicated cover type:

Forest and Woodlands: Green

Fed. Std. No. 595 34127

Sagebrush:

Gray

Fed. Std. No. 595 36357

C.I.E. Measurement x. 3264 y. 3411 Y.3659

Badlands:

Brown

Fed. Std. No. 595 30318

C.I.E. Measurement x. 3557 y. 3960 Y.3368

When such painted surfaces occur near roads and/or may be a safety hazard, a reflective or bright color shall be used.

9. Source of Cushioning Material

Pad dirt or cushioning material will be taken only from borrow pits authorized by the Area Director if not available within the utility right-of-way.

10. Road, Fence and Livestock Barriers

When the utility is to be placed under or over a BIA or State road right-of-way, the method of crossing shall be approved by the Commissioner or appropriate State Highway Department in advance of construction. Existing fences crossed by the right-of-way will be braced and tied off before cutting so as to prevent slacking of the wire. The opening will be closed temporarily as necessary during construction to prevent the escape of livestock and upon completion of construction the fence will be repaired to its original condition. If construction destroys a natural barrier used for livestock control, the gap shall be fenced to the satisfaction of the Commissioner and land user.

11. Maintenance of Reclamation of Roadways

Roads constructed and used for utility construction, maintenance and operation will be maintained twice each year with grading and cleaning of drainage structures. All roads constructed exclusively for construction purposes will be closed to vehicular traffic and rehabilitated after construction is completed as directed by the Commissioner unless otherwise specified by that official.

12. Water Bars

Grantee will place water bars on disturbed areas as required by the Commissioner. The following is a general guide for water bar spacing:

<u>% Slope</u>	<u>Spacing Interval</u>
Less than 2 1/2%	200 ft.
2 1/2%	150 ft.
6% to 9%	100 ft.
10% to 15%	50 ft.
More than 15%	30 ft.

13. Revegetation

Within one (1) year from the completion of construction, the Grantee shall seed disturbed areas designated by the Commissioner with plant species specified by that official. In addition, the Commissioner may require the following revegetation operations at Grantee's expense:

- a. Exclude domestic livestock from reseeded areas with fencing.
- b. Apply fertilizers as needed for vegetation establishment.
- c. Reseed and refertilize as needed for vegetation establishment.

14. Maintenance of Improvements

All existing improvement affected by construction and maintenance of right-of-way facilities shall be maintained in servicable condition at all times.

15. General Right-of-Way Maintenance

Grantee shall maintain right-of-way to the satisfaction of the Commissioner for the duration of the right-of-way. Such maintenance shall include, but not be limited to soil stabilization, removal of litter and maintenance of a clear and healthy environment.

16. Restoration Upon Right-of-Way Relinquishment

Upon relinquishment of this right-of-way, the Commissioner may require the removal of all aerial, surface and subsurface facilities from the right-of-way and reclamation operations, including but not limited to contouring cross-ripping and revegetation.

17. Raptor Protection

Aerial powerlines shall include all applicable design features described in the publication "Suggested Practices for Raptor Protection on Powerlines" available from:

Raptor Research Foundation, Inc.  
Department of Zoology - 167 WIBD  
Brigham Young University  
Provo, Utah 84601

The use of design features not included in this publication must be acceptable to the Commissioner.

The Commissioner reserves the right to require modification of or additions to all powerline structures placed on the right-of-way if the Navajo Tribal Fish and Wildlife Service determines such modifications or additions are necessary to insure the safety of raptor or birds of prey. Grantee shall assume full financial responsibility for the cost of such modifications or additions.





# NAVAJO NATION CORPORATION CODE

## CERTIFICATE OF AUTHORITY

*To all to Whom these Presents Shall Come, Greeting:*

I, the Director of the Business Regulatory Department, DO HEREBY  
CERTIFY that \*\*\* Table Top Telephone Company, Inc. \*\*\*  
File Number: 100323

a CORPORATION organized under the laws of the STATE OF  
Nevada was on the 20th day of  
August, 19 96, authorized to transact business within  
the Navajo Nation as FOREIGN CORPORATION.

I FURTHER CERTIFY that this corporation has filed all affidavits  
and annual reports and paid all annual filing fees required to date and, therefore,  
is in good standing within the Navajo Nation.



IN WITNESS WHEREOF, I have hereunto set  
my hand and affixed the official seal of the  
Navajo Nation Corporation Code.

Done at Window Rock, the Capital of the Navajo  
Nation, this 20th  
day of August, 19 96, A.D.

*Frank D. [Signature]*  
Director, Business Regulatory Department  
DIVISION OF ECONOMIC DEVELOPMENT



Form 481, Section 1000 Voice Service Rate Comparability  
Sub-Section 1010 Descriptive Document for Voice Services Rate  
Comparability

Pursuant to 47 C.F.R. § 54.313 (a) (10 ) Table Top Telephone Company, Inc. ("Table Top") is in compliance with the requirement that voice services is no more than two standard deviations above the national average urban rate for voice service of \$46.96 as specified in Public Notice DA 14-384 issued on March 20, 2014. Table Top's current total local end-user rate<sup>1</sup> of \$16.80 (which includes a local fee of \$00.00, mandated state fees of \$00.00 and mandatory extended area service charges of \$00.00) is not above the standard deviation as specified in the USF/ICC Transformation Order.<sup>2</sup>

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<sup>1</sup> Local End User Rate as defined in USF/ICC Transformation Order 26 FCC Rcd at 17751, Para. 238

<sup>2</sup> USF/ICC Transformation Order, 26 FCC Rcd at 17694, Para. 84 (footnote included) "The standard deviation is a measure of dispersion. The sample standard deviation is the square root of the sample variance. The sample variance is calculated as the sum of the squared deviations of the individual observations in the sample of data from the sample average divided by the total number of observations in the sample minus one. In a normal distribution, about 68 percent of the observations lie within one standard deviation above and below the average and about 95 percent of the observations lie within two standard deviations above and below the average."

## **Section 1200 Lifeline Terms and Conditions**

### **Sub-Section 1221 – 1223 Lifeline customers MOU and additional toll charges**

Lifeline customers receive the same residential service as a regular customer, but at a reduced monthly recurring rate. Thus, lifeline customers have an unlimited number of local calling minutes. As for toll, lifeline customers, similar to every Table Top Telephone Company customer, are free to choose their own toll usage plans through IXC's that serve Table Top Telephone Company.



# TABLE TOP TELEPHONE COMPANY, INC.

ARIZONA CORPORATION COMMISSION

1 st Revised Sheet No. 11  
Cancels Original Sheet No. 11

## DEFINITIONS (Cont'd)

ORIGINAL

### Subscriber

A person or agency subscribing for telephone service. As used in this Tariff, a separate subscriber is involved at each location, or continuous property, where service is furnished. One individual or firm therefore may be considered as two or more separate subscribers, even in the same Exchange. The privileges, restrictions, and rates established for a subscriber to any class of service are limited to the service at one location; no group treatment of service at separate locations furnished to one individual or firm, is contemplated or to be implied, except when definitely provided for in the schedules.

(T)

### Tariff

The document filed by the Company with the Public Utilities Commission which lists the communication services offered by the Company and the associated rates and charges.

### Telephone Station

A suitable telephone instrument, consisting of a transmitter, receiver, and associated apparatus, so connected as to permit transmitting of and receiving telephone messages.

### Tie Trunk

A circuit connecting two P.B.X. systems for the purpose of intercommunicating between the stations connected with such P.B.X. switching apparatus. The circuit is not intended to provide for general exchange service through either of the P.B.X. systems with which it connects.

### Toll Message

A message from a calling station to a station located in a different local service area.

### Toll Service

Telephone service rendered by the Company between patrons in different local service areas in accordance, with the rates and regulations specified in the Company's Toll Tariff.

### Trunk

A telephone communication channel between (a) two ranks of switching equipment in the same central office, (b) between central office units in the same switching center, or (c) between two switching centers.

DECISION #: 59422

Docket No. U-02724-95- 465

William J. Hayes  
600 N. Second Avenue  
Ajo, AZ 85321

Issued: November 1, 1995  
Effective: 12/20/95

**TABLE TOP TELEPHONE COMPANY, INC.**

5<sup>th</sup> Revised Sheet No. 46

**ARIZONA CORPORATION COMMISSION**

Cancels 4<sup>th</sup> Revised Sheet No. 46

**TRIBAL LINK UP**

1. GENERAL

Applicable to all residential customers of the Company on qualifying Tribal lands who apply for basic residential service, and meet the eligibility requirements detailed below.

2. DESCRIPTION

A. Tribal Linkup

Tribal Land Residents who qualify for the Federal Communication Commission's Tribal Link Up receive a 100% reduction, up to \$100.00 on access line service charges to connect service at a new address. The discount applies on a single line at the principal place of residence for the applicant.

Eligible charges include any charges customarily assessed to connect the subscriber to the network, including line extension charges, zone charges, and special construction charges.

3. ELIGIBILITY REQUIREMENTS

A. An applicant must be a resident on qualifying Tribal lands and meet all of the following criteria in order to qualify for Tribal Link Up.

1. The applicant must meet the same eligibility requirements that apply under Section 3 - Eligibility Requirements of the Lifeline tariff.
2. The customer must sign under penalty of perjury, a document certifying:
  - a. He/she is receiving benefits from one of the programs in A.1 Above or he/she has household income that is at or below 135% of the Federal Poverty Guidelines.

**TABLE TOP TELEPHONE COMPANY, INC.**

**ARIZONA CORPORATION COMMISSION**

5<sup>th</sup> Revised Sheet No. 46a  
Cancels 4<sup>th</sup> Revised Sheet No. 46a

**TRIBAL LINK UP** (Cont'd)

**3. ELIGIBILITY REQUIREMENTS** (Cont'd)

**A. Cont'd**

**2. (Cont'd)**

b. The Name of the program from which they are receiving benefits or provide documents that prove their household income is at or below 135% of the Federal Poverty Guidelines (from list in Section 3 – Eligibility Requirements of the Lifeline tariff.) (T)

c. That he/she will notify the company if he/she no longer participates in the program named in b. preceding or their household income increases above 135% of the Federal Poverty Guidelines. (T)

The Company will re-certify a customer's continuing eligibility on an annual basis. Records will be maintained by the Company in accordance with Arizona Corporation Commission Decision No. 67941 and FCC Order No. 12-11. (C)  
(C)

3. The premises at which their residential service is requested is the applicant's principal place of residence.

4. There is only one telephone line serving the residential premises. The residential premises shall consist of that portion of an individual house or building or one flat or apartment occupied by a single family or individuals functioning as one domestic unit.

5. A customer is not eligible for Tribal Link Up from the Company if he/she is currently receiving Lifeline or Tribal Link Up credit for service provided by another Eligible Telecommunications Carrier.

6. Tribal Link Up applicants must meet the Tribal Lifeline requirements noted in this tariff in the following Lifeline section.

**B. Tribal Link Up will not be furnished on a Foreign Exchange (FEX) basis.**

**C. Consumers shall be allowed to receive benefit under the Tribal Link Up Program for a second or subsequent time only for a principal place of residence with an address different from the residential address at which the Tribal Link Up assistance was previously provided.**



# TABLE TOP TELEPHONE COMPANY, INC.

2<sup>nd</sup> Revised Sheet No. 46b

ARIZONA CORPORATION COMMISSION Cancels 1st Revised Sheet No. 46b

## LIFELINE

### 1. GENERAL

Applicable to qualifying low-income subscribers to single party residential service of the Company. Residents of Tribal Lands can also qualify for the Federal portion of the Lifeline program based on terms and conditions for Tribal Lands.

### 2. RATES

A. Baseline Lifeline is a reduction or credit in the local service charges normally paid by qualifying low-income consumers. The reduction to the normal residential one-party rates are as follows:

#### Residential Access Lines

#### Monthly Credit or Discount

Federal Lifeline Support Credit:

\$ 9.25

(C)

(D)

(includes Federal End User Common Line Credit of \$6.50 and remainder \$2.75 credit covers basic service)

(N)

(N)

The credit is from the normal residential one-party service subscribed to by the consumer. The Federal lifeline support credit shall be used to waive the consumer's Federal End-User Common Line Charge or Subscriber Line Charge.

(T)

(T)

In no case will the discount exceed the rate charged for the service subscribed to by each individual.

B. The following services are included:

1. Single party, voice grade access to the Public Switched Network
2. Access to emergency services
3. Access to operator services
4. Access to interexchange services, unless toll blocking is chosen
5. Access to directory assistance
6. Toll Blocking

C. Tribal Lifeline

1. Tribal lifeline will consist of up to an additional \$25 per month, per primary residential connection for each qualifying low-income individual living on qualifying tribal lands.
2. Tribal Lifeline benefits apply to the primary local residential access line. The additional Federal Lifeline support will be provided to reduce the qualifying customer's basic monthly service rate to \$0.00 per month.

(C)

# TABLE TOP TELEPHONE COMPANY, INC.

ARIZONA CORPORATION COMMISSION

5<sup>th</sup> Revised Sheet No. 46c  
Cancels 4<sup>th</sup> Revised Sheet No. 46c

## LIFELINE (Cont'd)

### 3. ELIGIBILITY REQUIREMENTS <sup>1</sup>

A. An applicant must meet all of the following criteria in order to qualify for Lifeline Service:

1. To qualify for Lifeline the consumer must participate in one of the following programs:

- a. Medicaid
  - b. Food stamps, or Supplemental Nutrition Assistance Program (SNAP) (T)
  - c. Supplemental Security Income (SSI)
  - d. Federal Public Housing Assistance (Section 8) (T)
  - e. Low Income Home Energy Assistance Program (LIHEAP) (T)
  - f. Temporary Assistance for Needy Families (TANF)
  - g. National School Lunch Program's free lunch program (NSLP) (N)
  - h. KidsCare
  - i. State Children's Health Insurance Plan (SCHIP)
- or,

Have household income that is at or below 135% of the Federal Poverty Guidelines. (T)

2. The customer must sign under penalty of perjury, a document certifying:

- a. He/she is receiving benefits from one of the programs in 3.A. 1 above or he/she has household income that is at or below 135% of the Federal Poverty Guidelines. (T)
- b. He/she must provide the name of the program from which they are receiving benefits or provide supporting documents showing their household income is at or below 135% of Federal Poverty Guidelines. The supporting documents must be one of the following: 1) Prior year's state, federal, or tribal tax return; 2) Current income statements from an employer or paycheck stub; 3) A Social Security statement of benefits; 4) A Veterans Administration statement of benefits; 5) A retirement/pension statement of benefits; 6) An Unemployment/Workman's Compensation statement of benefits; 7) Bureau of Indian Affairs (BIA) general assistance program; 8) A divorce decree or child support document. If you choose to submit anything other than the prior year's income tax return, you must then present three consecutive month's of the alternate supporting documentation selected that is within the most recent twelve consecutive months. (T)

<sup>1</sup> Low-income customers who qualify under Arizona Low Income Telephone Assistance Program ("ALITAP") will receive the federal Lifeline support amount of \$9.25. See 46c 4<sup>th</sup> revised (T)  
(T)



# TABLE TOP TELEPHONE COMPANY, INC.

3<sup>rd</sup> Revised Sheet No. 46d

ARIZONA CORPORATION COMMISSION

Cancels 2<sup>nd</sup> Revised Sheet No. 46d

## LIFELINE (Cont'd)

### 3. ELIGIBILITY REQUIREMENTS (Cont'd)

#### A. (Cont'd)

- c. That he/she will notify the company if he/she no longer participates in the programs named in A.L. preceding or if their household income increases above 135% of the Federal Poverty Guidelines. (T)

The Company will re-certify a customer's continuing eligibility on an annual basis. Records will be maintained by the Company in accordance with Arizona Corporation Commission Decision No. 67941 and FCC Order No. 12-11. (C)  
(C)

3. The premises at which the residential service is requested is the applicant's principal place of residence.

4. Only one Lifeline service is available per household. A household is defined, for purposes of the Lifeline program, as any individual or group of individuals who live together at the same address and share income and expenses. (C)  
(C)

A customer is not eligible for Lifeline from the Company if he/she is currently receiving Lifeline or Tribal Link Up credit for service provided by another Eligible Telecommunications Carrier. (C)

#### 5. Tribal Lifeline

- 5.1 Residents of tribal lands who qualify for Lifeline based on the requirements listed below are eligible for the Tribal Lifeline benefit if they participate in one or more of the following programs or meet the Traditional lifeline eligibility requirements listed above.

- a. Bureau of Indian Affairs (BIA) general assistance program,  
b. Tribally administered Temporary Assistance for Needy Families block grant program,  
c. Head Start programs (only those meeting its income-qualifying standard),  
d. Food Distribution program on Indian Reservations (FDPIR). (C)



# TABLE TOP TELEPHONE COMPANY, INC.

1<sup>st</sup> Sheet No. 46e

ARIZONA CORPORATION COMMISSION

Cancels Original Sheet No. 46e

## LIFELINE (Cont'd)

### 3. ELIGIBILITY REQUIREMENTS (Cont'd)

#### 5. Tribal Lifeline (Cont'd)

5.2 The customer must sign, under penalty of perjury a document certifying that such customer receives benefits from at least one of the programs above, or has household income that is at or below 135% of the Federal Poverty Guidelines, and lives within a qualifying area. In addition, the customer must also agree to notify the Company if that customer ceases to participate in the qualifying program or their household income has increased above 135% of the Federal Poverty Guidelines.

(T)

(T)

- A. Lifeline will not be furnished on a Foreign Exchange (FEX) basis.
- B. Lifeline service shall not be disconnected for non-payment of toll charges.
- C. If the consumer chooses "toll blocking" the company will not charge a service deposit. Toll blocking will be provided to Lifeline subscribers at no charge.
- D. Partial payments from subscribers will first be applied to local service charges and then to any outstanding toll charges.

#### Limitation of Liability for Administering Link-Up America and Lifeline Assistance Programs

The Company shall use reasonable efforts to: (1) safeguard personal information provided by a customer in connection with an application for the Company's Link Up America and/or Lifeline Assistance programs; and (2) properly determine a customer's eligibility to participate in the Company's Link Up America and/or Lifeline Assistance programs. The Company shall not be liable to a customer for any damages (actual, consequential or punitive) arising as a result of (a) the Company's unintentional or accidental disclosure to a third party of a customer's personal information provided in connection with an application for the Company's Link Up America and/or Lifeline Assistance programs; or (b) the Company's erroneous determination regarding a customer's eligibility or ineligibility to participate in the Company's Link Up America and/or Lifeline Assistance programs. In the event the Company erroneously denies a customer's application to participate in the Company's Lifeline Assistance program, the customer shall be entitled to a bill credit equal to the amount of the monthly discount applied from the date of the customer's application through the date of actual enrollment in the Lifeline Assistance program, not to exceed one year.



USDA-RUS

This data will be used by RUS to review your financial situation. Your response is required by 7 U.S.C. 901 et seq. and, subject to federal laws and regulations regarding confidential information, will be treated as confidential.

**OPERATING REPORT FOR  
TELECOMMUNICATIONS BORROWERS**

BORROWER NAME

Table Top Telephone Company, Inc.

INSTRUCTIONS-Submit report to RUS within 30 days after close of the period.  
For detailed instructions, see RUS Bulletin 1744-2. Report in whole dollars only.

PERIOD ENDING

December, 2013

BORROWER DESIGNATION

AZ0516

**CERTIFICATION**

We hereby certify that the entries in this report are in accordance with the accounts and other records of the system and reflect the status of the system to the best of our knowledge and belief.

ALL INSURANCE REQUIRED BY 7 CFR PART 1788, CHAPTER XVII, RUS, WAS IN FORCE DURING THE REPORTING PERIOD AND RENEWALS HAVE BEEN OBTAINED FOR ALL POLICIES.

DURING THE PERIOD COVERED BY THIS REPORT PURSUANT TO PART 1788 OF 7CFR CHAPTER XVII  
(Check one of the following)

☒ All of the obligations under the RUS loan documents have been fulfilled in all material respects.

☐ There has been a default in the fulfillment of the obligations under the RUS loan documents. Said default(s) is/are specifically described in the Telecom Operating Report

Matthew Boos

3/31/2014

DATE

**PART A. BALANCE SHEET**

ASSETS	BALANCE PRIOR YEAR	BALANCE END OF PERIOD	LIABILITIES AND STOCKHOLDERS' EQUITY	BALANCE PRIOR YEAR	BALANCE END OF PERIOD
<b>CURRENT ASSETS</b>			<b>CURRENT LIABILITIES</b>		
1. Cash and Equivalents	5,170,758	4,443,404	25. Accounts Payable	5,797,062	1,283,837
2. Cash-RUS Construction Fund	3,912,313	1,075,327	26. Notes Payable	0	
3. Affiliates:			27. Advance Billings and Payments	212,671	240,899
a. Telecom, Accounts Receivable	0		28. Customer Deposits	135,584	54,735
b. Other Accounts Receivable	0		29. Current Mat. L/T Debt	1,513,159	1,582,282
c. Notes Receivable	0		30. Current Mat. L/T Debt-Rur. Dev.	0	
4. Non-Affiliates:			31. Current Mat.-Capital Leases	0	
a. Telecom, Accounts Receivable	1,328,782	980,293	32. Income Taxes Accrued	654,208	426,052
b. Other Accounts Receivable	0	520	33. Other Taxes Accrued	218,355	242,558
c. Notes Receivable	0		34. Other Current Liabilities	104,228	214,702
5. Interest and Dividends Receivable	400		35. Total Current Liabilities (25 thru 34)	8,635,267	4,045,065
6. Material-Regulated	129,320	128,888	<b>LONG-TERM DEBT</b>		
7. Material-Nonregulated	4,070		36. Funded Debt-RUS Notes	10,280,667	9,251,493
8. Prepayments	71,461	41,469	37. Funded Debt-RTB Notes	4,712,238	4,158,908
9. Other Current Assets	0		38. Funded Debt-FFB Notes	0	
10. Total Current Assets (1 Thru 9)	10,617,104	6,669,901	39. Funded Debt-Other	0	
<b>NONCURRENT ASSETS</b>			40. Funded Debt-Rural Develop. Loan	0	
1. Investment in Affiliated Companies			41. Premium (Discount) on L/T Debt	0	
a. Rural Development	0		42. Recaptured Debt	0	
b. Nonrural Development	0		43. Obligations Under Capital Lease	0	
2. Other Investments			44. Adv. From Affiliated Companies	0	
a. Rural Development	0		45. Other Long-Term Debt	0	
b. Nonrural Development	339,863	339,863	46. Total Long-Term Debt (36 thru 45)	14,992,905	13,410,401
3. Nonregulated Investments	15,434	4,258	<b>OTHER LIAB. &amp; DEF. CREDITS</b>		
4. Other Noncurrent Assets	0		47. Other Long-Term Liabilities	2,684,952	2,335,216
5. Deferred Charges	614,354	494,727	48. Other Deferred Credits	0	
6. Jurisdictional Differences	0		49. Other Jurisdictional Differences	0	
7. Total Noncurrent Assets (11 thru 16)	969,651	838,848	50. Total Other Liabilities and Deferred Credits (47 thru 49)	2,684,952	2,335,216
<b>PLANT, PROPERTY, AND EQUIPMENT</b>			<b>EQUITY</b>		
8. Telecom, Plant-in-Service	49,661,015	49,952,904	51. Cap. Stock Outstand. & Subscribed	5,500,000	5,500,000
9. Property Held for Future Use	0		52. Additional Paid-in-Capital	0	
10. Plant Under Construction	5,944,744	6,115,786	53. Treasury Stock	0	
11. Plant Adj., Nonop. Plant & Goodwill	6,142,633	6,142,633	54. Membership and Cap. Certificates	0	
12. Less Accumulated Depreciation	35,034,638	37,089,106	55. Other Capital	0	
13. Net Plant (18 thru 21 less 22)	26,713,754	25,122,217	56. Patronage Capital Credits	0	
14. TOTAL ASSETS (10+17+23)	38,300,509	32,630,966	57. Retained Earnings or Margins	5,487,385	7,340,284
			58. Total Equity (51 thru 57)	11,987,385	12,840,284
			59. TOTAL LIABILITIES AND EQUITY (35+46+50+58)	38,300,509	32,630,966

Total Equity = 39.35% % of Total Assets



<b>USDA-RUS</b>  <b>OPERATING REPORT FOR TELECOMMUNICATIONS BORROWERS</b>		<b>BORROWER DESIGNATION</b>  AZ0516
<b>INSTRUCTIONS- See RUS Bulletin 1744-2</b>		<b>PERIOD ENDING</b>  December, 2013
<b>PART B. STATEMENTS OF INCOME AND RETAINED EARNINGS OR MARGINS</b>		
ITEM	PRIOR YEAR	THIS YEAR
1. Local Network Services Revenues	1,244,297	1,179,572
2. Network Access Services Revenues	8,865,481	7,906,017
3. Long Distance Network Services Revenues	0	
4. Carrier Billing and Collection Revenues	8,358	7,748
5. Miscellaneous Revenues	52,906	32,407
6. Uncollectible Revenues	449	162
7. Net Operating Revenues (1 thru 5 less 6)	10,170,593	9,125,582
8. Plant Specific Operations Expense	1,755,627	1,550,503
9. Plant Nonspecific Operations Expense (Excluding Depreciation & Amortization)	732,810	1,015,537
10. Depreciation Expense	2,422,087	2,562,667
11. Amortization Expense	0	
12. Customer Operations Expense	400,254	412,578
13. Corporate Operations Expense	1,189,848	1,040,484
14. Total Operating Expenses (8 thru 13)	6,500,626	6,581,769
15. Operating Income or Margins (7 less 14)	3,669,967	2,543,813
16. Other Operating Income and Expenses	0	
17. State and Local Taxes	(58,094)	112,642
18. Federal Income Taxes	828,320	513,798
19. Other Taxes	445,004	487,595
20. Total Operating Taxes (17+18+19)	1,215,230	1,114,035
21. Net Operating Income or Margins (15+16-20)	2,454,737	1,429,778
22. Interest on Funded Debt	737,696	700,970
23. Interest Expense - Capital Leases	0	
24. Other Interest Expense	16,877	486
25. Allowance for Funds Used During Construction	2,199	
26. Total Fixed Charges (22+23+24-25)	752,374	701,456
27. Nonoperating Net Income	26,818	117,849
28. Extraordinary Items	0	
29. Jurisdictional Differences	0	
30. Nonregulated Net Income	80,935	6,728
31. Total Net Income or Margins (21+27+28+29+30-26)	1,810,116	852,899
32. Total Taxes Based on Income	739,308	552,035
33. Retained Earnings or Margins Beginning-of-Year	4,677,269	6,487,385
34. Miscellaneous Credits Year-to-Date	0	
35. Dividends Declared (Common)	0	
36. Dividends Declared (Preferred)	0	
37. Other Debits Year-to-Date	0	
38. Transfers to Patronage Capital	0	
39. Retained Earnings or Margins End-of-Period [(31+33+34) - (35+36+37+38)]	6,487,385	7,340,284
40. Patronage Capital Beginning-of-Year	0	
41. Transfers to Patronage Capital	0	
42. Patronage Capital Credits Retired	0	
43. Patronage Capital End-of-Year (40+41-42)	0	0
44. Annual Debt Service Payments	2,214,351	2,214,351
45. Cash Ratio [(14+20-10-11) / 7]	0.5205	0.5625
46. Operating Accrual Ratio [(14+20+26) / 7]	0.8326	0.9202
47. TIER [(31+26) / 26]	3.4059	2.2159
48. DSCR [(31+26+10+11) / 44]	2.2510	1.8592



USDA-RUS		BORROWER DESIGNATION	
OPERATING REPORT FOR TELECOMMUNICATIONS BORROWERS		AZ0516	
		PERIOD ENDED December, 2013	
INSTRUCTIONS -- See help in the online application.			
PART I - STATEMENT OF CASH FLOWS			
1.	Beginning Cash (Cash and Equivalents plus RUS Construction Fund)	9,083,071	
CASH FLOWS FROM OPERATING ACTIVITIES			
2.	Net Income	852,899	
Adjustments to Reconcile Net Income to Net Cash Provided by Operating Activities			
3.	Add: Depreciation	2,562,667	
4.	Add: Amortization	0	
5.	Other (Explain)		
Changes in Operating Assets and Liabilities			
6.	Decrease/(Increase) in Accounts Receivable	347,969	
7.	Decrease/(Increase) in Materials and Inventory	4,502	
8.	Decrease/(Increase) in Prepayments and Deferred Charges	149,619	
9.	Decrease/(Increase) in Other Current Assets	0	
10.	Increase/(Decrease) in Accounts Payable	(4,513,225)	
11.	Increase/(Decrease) in Advance Billings & Payments	28,228	
12.	Increase/(Decrease) in Other Current Liabilities	(93,479)	
13.	Net Cash Provided/(Used) by Operations	(660,820)	
CASH FLOWS FROM FINANCING ACTIVITIES			
14.	Decrease/(Increase) in Notes Receivable	0	
15.	Increase/(Decrease) in Notes Payable	0	
16.	Increase/(Decrease) in Customer Deposits	(80,849)	
17.	Net Increase/(Decrease) in Long Term Debt (Including Current Maturities)	(1,513,381)	
18.	Increase/(Decrease) in Other Liabilities & Deferred Credits	(349,736)	
19.	Increase/(Decrease) in Capital Stock, Paid-in Capital, Membership and Capital Certificates & Other Capital	0	
20.	Less: Payment of Dividends	0	
21.	Less: Patronage Capital Credits Retired	0	
22.	Other (Explain)		
23.	Net Cash Provided/(Used) by Financing Activities	(1,943,966)	
CASH FLOWS FROM INVESTING ACTIVITIES			
24.	Net Capital Expenditures (Property, Plant & Equipment)	(462,931)	
25.	Other Long-Term Investments	11,176	
26.	Other Noncurrent Assets & Jurisdictional Differences	0	
27.	Other (Explain) Cost of Removal, Salvage, Retirements and Reclassify Capital Expenditure to Expense	(507,799)	
28.	Net Cash Provided/(Used) by Investing Activities	(959,554)	
29.	Net Increase/(Decrease) in Cash	(3,564,340)	
30.	Ending Cash	5,518,731	

Revision Date 2010



To the Board of Directors  
Table Top Telephone Company  
Ajo, Arizona

We have audited the financial statements of Table Top Telephone Company as of and for the year ended June 30, 2013, and have issued our report thereon dated October 29, 2013.

Professional standards and the Rural Development Utilities Program's (RDUP) Policy on Audits of RDUP Borrowers (7 CFR 1773.20) require the auditor to communicate certain matters to the board of directors. In addition to meeting the RDUP's requirements, the following comments regarding our responsibilities and results of our audit of the financial statements of Table Top Telephone Company for the year ended June 30, 2013, will assist you in overseeing the financial reporting and disclosure process for which management is responsible.

#### **Our Responsibility under U.S. Generally Accepted Auditing Standards**

Our responsibility as described by professional standards and stated in our engagement letter, is to express an opinion about whether the financial statements prepared by management with your oversight are fairly presented, in all material respects, in conformity with accounting principles generally accepted in the United States of America. Our audit of the financial statements does not relieve you or management of your responsibilities. We conducted our audit in accordance with auditing standards generally accepted in the United States of America and Government Auditing Standards issued by the Comptroller General of the United States. Those standards require that we plan and perform the audit to obtain reasonable, but not absolute, assurance that the financial statements are free of material misstatement and are fairly presented in accordance with accounting principles generally accepted in the United States of America. Because an audit is designed to provide reasonable, but not absolute, assurance and because we did not perform a detailed examination of all transactions, there is a risk that material errors, fraud or other illegal acts may exist and not be detected by us.

As part of our audit, we considered the internal control of Table Top Telephone Company. Such considerations were solely for the purpose of determining our audit procedures and not to provide any assurance concerning such internal control. We are responsible for communicating significant matters related to the audit that are, in our professional judgment, relevant to your responsibilities in overseeing the financial reporting process. However, we are not required to design procedures specifically to identify such matters. We are also responsible for communicating matters required by law, regulation, agreement or other requirements applicable to the engagement to you.

#### **Planned Scope and Timing of the Audit**

We performed the audit according to the planned scope and timing previously communicated to you in our engagement letter.



## **Significant Audit Findings**

### Qualitative Aspects of Accounting Practices

Management is responsible for the selection and use of appropriate accounting policies.

The significant accounting policies of the Company are described in footnotes to the financial statements. No new accounting policies were adopted and the application of existing policies was not changed during the year ended June 30, 2013.

Accounting estimates are an integral part of the financial statements prepared by management and are based on management's knowledge and experience about past and current events and assumptions about future events. Certain accounting estimates are particularly sensitive because of their significance to the financial statements and because of the possibility that future events affecting them may differ significantly from those expected.

The only sensitive accounting estimates included in the financial statements for the year ended June 30, 2013, relate to the estimate for depreciation. As part of our audit, we compared the Company's depreciation rates to average rates used within the telecommunications industry. We have also discussed with management the Company's long-range plant replacement plans and have determined the current depreciation rates to be consistent with those plans.

### Difficulties Encountered in Performing the Audit

We encountered no significant difficulties in dealing with management in performing and completing our audit.

### Corrected and Uncorrected Misstatements

Professional standards require us to accumulate all known and likely misstatements identified during the audit, other than those that are trivial, and communicate them to the appropriate level of management. Management has corrected all such misstatements. In addition, none of the misstatements detected as a result of audit procedures and corrected by management were material, either individually or in the aggregate, to the financial statements taken as a whole.

Our independent auditors' report on internal control over financial reporting and on compliance and other matters, and our separate letter to the board of directors all dated October 29, 2013, comment on other findings and recommendations.

### Disagreements with Management

For purposes of this letter, professional standards define a disagreement with management as a financial accounting, reporting or auditing matter, whether or not resolved to our satisfaction, that could be significant to the financial statements or the auditors' report. We are pleased to report that no such disagreements arose during the course of our audit that individually or in the aggregate were of such significance that reference to the subject matter would have been made in our reports.

### Management Representations

We have requested certain representations from management that are included in the management representation letter dated October 29, 2013.

#### Management Consultations with Other Independent Accountants

In some cases, management may decide to consult with other accountants about auditing and accounting matters, similar to obtaining a "second opinion" on certain situations. If a consultation involves application of an accounting principle to the Company's financial statements or a determination of the type of auditor's opinion that may be expressed on those statements, our professional standards require the consulting accountant to check with us to determine that the consultant has all the relevant facts. To our knowledge, there were no such consultations with other accountants.

#### Other Audit Findings or Issues

We generally discuss a variety of matters, including the application of accounting principles and auditing standards, with management each year prior to retention as the Company's auditor. However, these communications occurred in the normal course of our professional relationship and to our knowledge our responses were not a condition to our retention.

This letter is intended solely for the information and use of the board of directors and management of the Company and is not intended to be and should not be used by anyone other than these specified parties.

*Kimberly Austin LLP*

Colorado Springs, Colorado  
October 29, 2013